

Date	Hours	Activity category	Description	Rate (\$)	Billable (\$)	User	Role
11/23/22	2	Full Intake (obtain answers to questionnaire from PNC)	Full intake call + post full intake tasks completed. PNC was an IC. Tasked PD for review before scheduling atty mtg.	\$ 125.00	\$ 250.00	Brissa Chavez	Client Relations Specialist
2/17/23	0.3	Send/Receive Texts	SMS'd PNC atty mtg invite	\$ 125.00	\$ 37.50	Brissa Chavez	Client Relations Specialist
2/22/23	0.6	Call	Call with PNC to schedule atty mtg. Added corresponding task dates in zoho and Asana. Added WP link to cal entry. EM'd CDOX request again to PNC. SMS'd atty mtg details to PNC as he requested.	\$ 125.00	\$ 75.00	Brissa Chavez	Client Relations Specialist
2/27/23	0.5	Send/Receive Texts	Linked CDOX to cal entry and Asana mother task. SMS'd PNC atty mtg reminder.	\$ 125.00	\$ 62.50	Brissa Chavez	Client Relations Specialist
2/28/23	0.9	Telephone/Video Meeting	Ellie Shkolir and Penn Dodson	\$ 450.00	\$ 405.00	Penn Dodson	Partner
3/15/23	0.2	Communicate with Client	I spoke with client	\$ 175.00	\$ 35.00	Jessica Balint	Paralegal
3/15/23	0.3	Communicate with Client	Spoke with client about W2	\$ 175.00	\$ 52.50	Jessica Balint	Paralegal
3/15/23	0.1	Mail Processing	processed in cdoc	\$ 45.00	\$ 4.50	Jessica Balint	Paralegal
3/20/23	0.1	Call	Call attempt to obtain info about coworker who might be additional plaintiff. No answer, unable to leave VM.	\$ 125.00	\$ 12.50	Brissa Chavez	Client Relations Specialist
3/21/23	0.3	Intake 1st Tier + Enter Into Zoho	Call to scheduled additional plaintiff PNC Rashad Williams with intake mtg. Created his lead in Zoho.	\$ 125.00	\$ 37.50	Brissa Chavez	Client Relations Specialist
3/21/23	0.4	Zoho CRM Data entry of PNC Info into new Zoho entry from electronic submission	Call to try and schedule additional plaintiff PNC Eugene with intake mtg. Speaks almost no English. SMS'd contact info I need to enter him into zoho.	\$ 125.00	\$ 50.00	Brissa Chavez	Client Relations Specialist
3/27/23	1.8	Full Intake (obtain answers to questionnaire from PNC)	full intake call for PNC Williams Full intake completed. Additional plaintiff to 00799. Uploaded WP to Shkolir v rx2go WP. Associated contact in Clio. Tasked PD for review. EM'd CDOX request.	\$ 125.00	\$ 225.00	Brissa Chavez	Client Relations Specialist
3/30/23	1.9	Full Intake (obtain answers to questionnaire from PNC)	Full intake call with additional plaintiff PNC Evgenii Badgaev. Uploaded WP and linked. Associated to mother matter in Clio. Tasked PD for review.	\$ 125.00	\$ 237.50	Brissa Chavez	Client Relations Specialist
3/30/23	0.2	Communicate with Client	spoke with client re: referral	\$ 175.00	\$ 35.00	Jessica Balint	Paralegal
4/1/23	0.3	Analysis/ Substantive Review	Review additional Plaintiff intake info; decide whether to sched call and/or propound LSA - Rashad Williams	\$ 450.00	\$ 135.00	Penn Dodson	Partner
4/6/23	1.6	Full Intake (obtain answers to questionnaire from PNC)	Full intake + post intake tasks completed for additional plaintiff Badmaez. Tasked PD for review.	\$ 125.00	\$ 200.00	Brissa Chavez	Client Relations Specialist
4/6/23	0.2		Linked CDOX for PNC Williams in mother task. Tasked PD to notify and to send LSA.	\$ 125.00	\$ 25.00	Brissa Chavez	Client Relations Specialist
4/20/23	0.1	Communicate with Client	LVM, attempted to reach out to client	\$ 175.00	\$ 17.50	Jessica Balint	Paralegal
4/22/23	0.2	Analysis/ Substantive Review	Review additional Plaintiff Badmaez intake info; decide whether to sched call	\$ 450.00	\$ 90.00	Penn Dodson	Partner
4/24/23	0.3	Send/Receive Texts	SMS to additional plaintiffs Badmaez and Badgaev for CDOX check ins.	\$ 125.00	\$ 37.50	Brissa Chavez	Client Relations Specialist
4/24/23	0.2	Process in Client Documents (CDOX)	Processed in only CDOX from addt'l plaintiff Badgaev. Work ID badge. Uploaded to SP.	\$ 125.00	\$ 25.00	Brissa Chavez	Client Relations Specialist
4/25/23	0.2	Call	Call to PNC Sangadzi Badmaez to inquire on his CDOX. Stated he can only think of potential bank statements that show payments made to his LLC. He will work on getting these. Will follow up about this with hi..	\$ 125.00	\$ 25.00	Brissa Chavez	Client Relations Specialist
4/25/23	0.2		Update to PD about Badgaev CDOX. Waiting for approval to send LSA.	\$ 125.00	\$ 25.00	Brissa Chavez	Client Relations Specialist
4/27/23	0.3	Compose/Send Email	EM'd addt'l plaintiff Badgaev out of court LSA	\$ 125.00	\$ 37.50	Brissa Chavez	Client Relations Specialist
4/28/23	0.2	Call	Call to check in on progress of CDOX. Asked me to give him until next Wednesday to try and get bank statements.	\$ 125.00	\$ 25.00	Brissa Chavez	Client Relations Specialist
5/1/23	0.2	Send/Receive Texts	SMS'd PNC Rashad Williams LSA reminder	\$ 125.00	\$ 25.00	Brissa Chavez	Client Relations Specialist
5/3/23	0.2	Call	Call attempt and SMS to PNC Sangadzi Badmaez to check on CDOX progress with his bank.	\$ 125.00	\$ 25.00	Brissa Chavez	Client Relations Specialist
5/4/23	0.2	Compose/Send Email	EM'd addy'l plaintiff Badmaez CDOX reminder.	\$ 125.00	\$ 25.00	Brissa Chavez	Client Relations Specialist
5/5/23	0.2	Send/Receive Texts	SMS'd PNC addt'l plaintiff Badmaez for CDOX reminder.	\$ 125.00	\$ 25.00	Brissa Chavez	Client Relations Specialist
5/8/23	0.3	Call	Call to PNC Badmaez and EM about CDOX and associated deadline to send.	\$ 125.00	\$ 37.50	Brissa Chavez	Client Relations Specialist
5/8/23	0.2	Analysis/ Substantive Review	Review addl P info	\$ 450.00	\$ 90.00	Penn Dodson	Partner

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5/8/23	0.2	Analysis/ Substantive Review	Review additional Plaintiff intake info; decide whether to sched call and/or propound LSA	\$ 450.00	\$ 90.00	Penn Dodson	Partner
5/9/23	0.2	Communicate with Client		\$ 175.00	\$ 35.00	Jessica Balint	Paralegal
5/9/23	0.2	Admin - General Admin	internal comm re demand and additional plaintiffs	\$ 45.00	\$ 9.00	Jessica Balint	Paralegal
5/16/23	0.1	Check Status		\$ 175.00	\$ 17.50	Jessica Balint	Paralegal
6/5/23	1	Substantive, High-Level Legal Document Drafting/Revisions	revise demand ltr packet	\$ 450.00	\$ 450.00	Penn Dodson	Partner
6/6/23	0.2	Check Status		\$ 175.00	\$ 35.00	Jessica Balint	Paralegal
6/8/23	0.8	Admin - General Admin	Edit/Propound demands (3 addresses)/update tasks/calendars	\$ 45.00	\$ 36.00	Callyn Carter	Paralegal
6/15/23	0.2	Document Review		\$ 195.00	\$ 39.00	Jessica Balint	Paralegal
6/16/23	0.2	Check Status		\$ 175.00	\$ 35.00	Jessica Balint	Paralegal
6/20/23	0.4	Admin - General Admin	Pulled tracking	\$ 45.00	\$ 18.00	Callyn Carter	Paralegal
6/23/23	0.6	Draft Demand Letter	Draft/Edit 2nd demand/Propound demand/Update Asana tasks, Update slack channel	\$ 95.00	\$ 57.00	Callyn Carter	Paralegal
7/5/23	0.4	Draft Demand Letter	Draft/Edit 3rd demand/Propound (no complaint)/Update tasks	\$ 150.00	\$ 60.00	Callyn Carter	Paralegal
7/24/23	0.3	Telephone/Video Meeting	Spoke with Ellie Shkolir	\$ 195.00	\$ 58.50	Jessica Balint	Paralegal
7/24/23	0.3	Telephone/Video Meeting	call with client regarding the status of the case	\$ 195.00	\$ 58.50	Jessica Balint	Paralegal
7/27/23	0.7	Assemble / gather / collect documents together	Put Cdox into TOC/ organized	\$ 195.00	\$ 136.50	Jessica Balint	Paralegal
7/27/23	0.3	Periodic Case Review		\$ 195.00	\$ 58.50	Jessica Balint	Paralegal
8/7/23	0.5	Telephone/Video Meeting	Called all clients re: LSA and deposit information	\$ 195.00	\$ 97.50	Jessica Balint	Paralegal
8/17/23	0.5	Telephone/Video Meeting	I spoke with 3 separate clients regarding the deposit	\$ 195.00	\$ 97.50	Jessica Balint	Paralegal
8/24/23	0.3	Periodic Case Review	concerning paid deposits for generating the complaint	\$ 195.00	\$ 58.50	Jessica Balint	Paralegal
8/25/23	0.3	Telephone/Video Meeting	Call to client Eli Shkolir concerning outstanding deposit	\$ 195.00	\$ 58.50	Jessica Balint	Paralegal
9/1/23	0.2	Periodic Case Review		\$ 195.00	\$ 39.00	Jessica Balint	Paralegal
9/1/23	0.2	Telephone/Video Meeting	called client concerning legal services agreement and required signature	\$ 195.00	\$ 39.00	Jessica Balint	Paralegal
9/13/23	1.1	Research	Background research on company + its agents	\$ 450.00	\$ 495.00	Penn Dodson	Partner
9/13/23	2.1	Edit Document	Revise complaint (3 plaintiffs, allegations requiring more analysis / editing than usual)	\$ 450.00	\$ 945.00	Penn Dodson	Partner
9/18/23	0.3	Telephone/Video Meeting	Spoke with Client Eli Shkolir concerning complaint	\$ 195.00	\$ 58.50	Jessica Balint	Paralegal
9/20/23	0.9	Mail Processing	Processed in numerous text messages from client	\$ 45.00	\$ 40.50	Jessica Balint	Paralegal
9/20/23	0.4	Assemble / gather / collect documents together	PDF's all text messages and added to client document (YOC) Spreadsheet	\$ 195.00	\$ 78.00	Jessica Balint	Paralegal
9/21/23	0.2	Send/Receive Texts	sent client a text regarding setting up a meeting with translation assistance	\$ 195.00	\$ 39.00	Jessica Balint	Paralegal
9/21/23	0.2	Book appointment/ schedule meeting (incl. reserving space etc. if applicable)	Booked Appointment with Penn and Marcus for Evgenii	\$ 195.00	\$ 39.00	Jessica Balint	Paralegal
9/27/23	0.7	Draft document (other)	Made sure to draft 2 Summons, Civil cover sheet prior to filing complaint	\$ 195.00	\$ 136.50	Jessica Balint	Paralegal
9/27/23	0.2	Call	client call marc will translate 00799 Shkolir v RX2GO	\$ 450.00	\$ 90.00	Penn Dodson	Partner
9/28/23	0.6	Assemble / gather / collect documents together	assembled all three verifications on DocuSign for Client's signature	\$ 195.00	\$ 117.00	Jessica Balint	Paralegal
9/28/23	0.8	File Document with Courts	Create an ECF case, File complaint, Civil Cover, both Summons for clerk to stamp	\$ 195.00	\$ 156.00	Jessica Balint	Paralegal
9/28/23	0.5	Draft document (other)	Draft/ set up 3 "what to expect letters re litigation" to clients	\$ 195.00	\$ 97.50	Jessica Balint	Paralegal
9/28/23	0.4	Compose/Send Email	Email "what to expect letters re litigation" to all three clients	\$ 195.00	\$ 78.00	Jessica Balint	Paralegal
9/29/23	0.3	Admin - General Admin	Set up tasking in Asana. Looked into post complaint filing tasks	\$ 45.00	\$ 13.50	Jessica Balint	Paralegal
9/29/23	0.3	Calendar & Task Out All Deadlines/ Appearances/ Dates From Scheduling Order/CMO/TMO	calendared service date in both Asana tasker and Outlook calendar	\$ 195.00	\$ 58.50	Jessica Balint	Paralegal
10/3/23	0.5	Process Electronic Court Documents	Processed in Dockets post complaint filing	\$ 195.00	\$ 97.50	Jessica Balint	Paralegal
10/5/23	0.9	Calendar & Task Out All Deadlines/ Appearances/ Dates From Scheduling Order/CMO/TMO	calendared IPTC dates after order came through from the court as well as other related dates, added to asana and Outlook calendar	\$ 195.00	\$ 175.50	Jessica Balint	Paralegal
10/6/23	0.4	File Document with Courts	refiled summons for corporation for clerk's "Stamp"/ approval	\$ 195.00	\$ 78.00	Jessica Balint	Paralegal
10/18/23	0.3	Telephone/Video Meeting	called EDNY ECF office to call to their attention outstanding "stamped" summons of Corp. They confirmed it was an oversight	\$ 195.00	\$ 58.50	Jessica Balint	Paralegal
10/18/23	0.3	Process Electronic Court Documents	processed in Corporation summons (Stamped by clerk)	\$ 195.00	\$ 58.50	Jessica Balint	Paralegal
10/18/23	0.6	Compose/Send Email	emailed both Process servers : one in Pennsylvania (individual defendant), and one in NY (United processing for Corp service).	\$ 195.00	\$ 117.00	Jessica Balint	Paralegal
10/24/23	0.3	Mail Processing	Processed in notice of appearance	\$ 45.00	\$ 13.50	Jessica Balint	Paralegal
10/24/23	0.3	Process Electronic Court Documents	processed in Answer to complaint	\$ 195.00	\$ 58.50	Jessica Balint	Paralegal
10/24/23	0.4	Calendar & Task Out All Deadlines/ Appearances/ Dates From Scheduling Order/CMO/TMO	calendar motion to strike dates on both Asana and Outlook calendar	\$ 195.00	\$ 78.00	Jessica Balint	Paralegal
10/24/23	0.3	Telephone/Video Meeting	cave client Elli Shkolir a case update	\$ 195.00	\$ 58.50	Jessica Balint	Paralegal
10/30/23	0.3	Admin - General Admin	Pay process server	\$ 45.00	\$ 13.50	Jessica Balint	Paralegal
10/30/23	0.4	Mail Processing	processed in affidavit of service from process server	\$ 45.00	\$ 18.00	Jessica Balint	Paralegal
11/6/23	0.3	Telephone/Video Meeting	call with client's concerning Defendant's ongoing contact	\$ 195.00	\$ 58.50	Jessica Balint	Paralegal
11/6/23	0.4	Compose/Send Email	emailed client's a reminder for sending us "recording"	\$ 195.00	\$ 78.00	Jessica Balint	Paralegal
11/6/23	0.3	Compose/Send Email	emailed opposing counsel concerning defendant's contact with our clients	\$ 195.00	\$ 58.50	Jessica Balint	Paralegal
11/8/23	0.2	Compose/Send Email	Email check in and supportive documents request to PNC Badmaez	\$ 125.00	\$ 25.00	Brissa Chavez	Client Relations Specialist
11/9/23	0.3		Tasked PD to revisit additional plaintiff PNC Badmaez for LSA decision. Linked CDOX and WP for review.	\$ 125.00	\$ 37.50	Brissa Chavez	Client Relations Specialist
11/16/23	0.5	Draft document (other)	began setting setting up case management/ discovery plan.	\$ 195.00	\$ 97.50	Jessica Balint	Paralegal
11/29/23	0.5	Draft document (other)	Drafted initial Disclosures	\$ 195.00	\$ 97.50	Jessica Balint	Paralegal
12/4/23	0.2	Send/Receive Texts	text to client Rashad Williams	\$ 195.00	\$ 39.00	Jessica Balint	Paralegal

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12/9/23	0.4	Periodic Case Review	reviewed upcoming deadlines in preparation for following week	\$ 195.00	\$ 78.00	Jessica Balint	Paralegal
12/11/23	0.1	Send/Receive Texts	SMS's PNC Badmaez CDOX check in.	\$ 125.00	\$ 12.50	Brissa Chavez	Client Relations Specialist
12/11/23	0.4	Communicate	communication with colleague on scheduling Rule 26 meeting with Christopher Anderson	\$ 195.00	\$ 78.00	Jessica Balint	Paralegal
12/11/23	0.3	Compose/Send Email	Email to opposing counsel concerning dates for rule 26 conference	\$ 195.00	\$ 58.50	Jessica Balint	Paralegal
12/12/23	0.8	Edit Document	revised Judge's proposed case management order	\$ 195.00	\$ 156.00	Jessica Balint	Paralegal
12/12/23	0.2	Read/review incoming email or correspondence	read Email from opposing counsel/ confirming dates for rule 26 call	\$ 195.00	\$ 39.00	Jessica Balint	Paralegal
12/12/23	0.3	Book appointment/ schedule meeting (incl. reserving space etc. if applicable)	calendared Rule 26 conference on attorney's calendar	\$ 195.00	\$ 58.50	Jessica Balint	Paralegal
12/12/23	0.5	Draft document (other)	set up letter motion to convert in-person initial pretrial conference to a teleconference	\$ 195.00	\$ 97.50	Jessica Balint	Paralegal
12/13/23	1	Draft document (other)	set up stipulation concerning conditional cert along with consent and notice for attorney review and revisions	\$ 195.00	\$ 195.00	Jessica Balint	Paralegal
12/14/23	0.2	Telephone/Video Meeting	Call to PNC Badmaez to check in about CDOX. Claimed already sent. Text him ADPC docs email.	\$ 125.00	\$ 25.00	Brissa Chavez	Client Relations Specialist
12/14/23	1	Draft document (other)	set up discovery requests: Requests for production and interrogatory requests	\$ 195.00	\$ 195.00	Jessica Balint	Paralegal
12/15/23	0.5	Draft document (other)	Type of transcript of Rashad Williams and Erkin's phone call for PD	\$ 150.00	\$ 75.00	Callyn Carter	Paralegal
12/15/23	0.3	Compose/Send Email	sent email to Opposing Counsel with collective certification documents attached	\$ 195.00	\$ 58.50	Jessica Balint	Paralegal
12/15/23	0.3	Assemble / gather / collect documents together	assemble collective certification documents for email to Opposing Counsel	\$ 195.00	\$ 58.50	Jessica Balint	Paralegal
12/15/23	0.2	Telephone/Video Meeting	called Client Rashad Williams about recording he has of defendant	\$ 195.00	\$ 39.00	Jessica Balint	Paralegal
12/15/23	0.2	Mail Processing	processed in recording of defendant	\$ 45.00	\$ 9.00	Jessica Balint	Paralegal
12/20/23	0.2	Compose/Send Email	Review OC's email re my prp stip to condl cert, EM him back	\$ 450.00	\$ 90.00	Penn Dodson	Partner
12/21/23	0.3	Mail Processing	processed in Opposing Counsel's response concerning collective certification stipulation and notified handling attorney on slack	\$ 45.00	\$ 13.50	Jessica Balint	Paralegal
12/27/23	0.4	Process Documents	processed in client documents from Rashad Williams	\$ 195.00	\$ 78.00	Jessica Balint	Paralegal
1/2/24	0.4	Edit Document	Edit prp disc plan form, EM OC re ESI, data production, disc schedule	\$ 450.00	\$ 180.00	Penn Dodson	Partner
1/3/24	0.3	Read/review incoming email or correspondence	read emails from handling attorney to Opposing Counsel and vice versa	\$ 195.00	\$ 58.50	Jessica Balint	Paralegal
1/3/24	0.3		sent over letter motion to convert initial pretrial conference to virtual/tele in an effort to Confer	\$ 195.00	\$ 58.50	Jessica Balint	Paralegal
1/3/24	0.4	File Document with Courts	filed letter motion to convert IPTC to a teleconference	\$ 195.00	\$ 78.00	Jessica Balint	Paralegal
1/4/24	0.3	Process Electronic Court Documents	processed in order regarding Converting IPTC to Phone Conference	\$ 195.00	\$ 58.50	Jessica Balint	Paralegal
1/5/24	0.4	Communicate	communicate with colleague concerning handling attorney's schedule/ coordinate booking	\$ 195.00	\$ 78.00	Jessica Balint	Paralegal
1/5/24	0.3	Book appointment/ schedule meeting (incl. reserving space etc. if applicable)	switched booking from one attorney's calendar to another after coordination	\$ 195.00	\$ 58.50	Jessica Balint	Paralegal
1/8/24	0.3	Compose/Send Email	emailed reminder to Opposing Counsel concerning needed documents	\$ 195.00	\$ 58.50	Jessica Balint	Paralegal
1/9/24	0.4	Admin - General Admin	Set up a check request concerning united processing charges (re: outstanding process service charges) and ensured invoice was linked and added to clio	\$ 45.00	\$ 18.00	Jessica Balint	Paralegal
1/13/24	0.3	Compose/Send Email	emailed Opposing Counsel and paralegals Confirmation for Rule 26 conference	\$ 195.00	\$ 58.50	Jessica Balint	Paralegal
1/16/24	0.2	Read/review incoming email or correspondence	read incoming email from Opposing Counsel's Paralegals Confirming rule 26 meeting	\$ 195.00	\$ 39.00	Jessica Balint	Paralegal
1/16/24	0.3	Read/review incoming email or correspondence	read incoming email from Opposing Counsel 's para concerning rescheduling the Rule 26 conference	\$ 195.00	\$ 58.50	Jessica Balint	Paralegal
1/16/24	0.5	Book appointment/ schedule meeting (incl. reserving space etc. if applicable)	reworked booking for rule 26 conference with respect to Opposing Counsel's cancellation due to illness	\$ 195.00	\$ 97.50	Jessica Balint	Paralegal
1/16/24	0.5	Compose/Send Email	emailed with Opposing Counsel's paralegals concerning rescheduling of rule 26 conference and specified all items which are outstanding and owed by them	\$ 195.00	\$ 97.50	Jessica Balint	Paralegal
1/19/24	0.2	Telephone/Video Meeting	attempted to reach out to Opposing Counsel's paralegal Tara. She was OOO for the day.	\$ 195.00	\$ 39.00	Jessica Balint	Paralegal
1/19/24	0.4	Assemble / gather / collect documents together	assembled notice and consent as well as letter motion/stipulation for Collective certification for filing	\$ 195.00	\$ 78.00	Jessica Balint	Paralegal
1/19/24	0.5	File Document with Courts	filed stipulation/ motion for collective certification along with proposed notice and consent forms and processed in dockets following the filing	\$ 195.00	\$ 97.50	Jessica Balint	Paralegal
1/24/24	0.5	Draft document (other)	finalized court appearance form for IPTC	\$ 195.00	\$ 97.50	Jessica Balint	Paralegal
1/25/24	0.4	Assemble / gather / collect documents together	assembled case management plan PDF (and revised) prior to filing	\$ 195.00	\$ 78.00	Jessica Balint	Paralegal
1/25/24	0.4	File Document with Courts	file case management plan and process in filing	\$ 195.00	\$ 78.00	Jessica Balint	Paralegal
1/25/24	0.5	Call	Rule 26 Call with OC Stephen Hans @2pm EST	\$ 450.00	\$ 225.00	Penn Dodson	Partner
1/31/24	0.5	Process Electronic Court Documents	processed in Dockets 14, 15, 15.1 into sharepoint file	\$ 195.00	\$ 97.50	Jessica Balint	Paralegal
1/31/24	0.3	Communicate	communicated info concerning latest docket entries on slack	\$ 195.00	\$ 58.50	Jessica Balint	Paralegal
1/31/24	0.4	Periodic Case Review	concerning discovery status	\$ 195.00	\$ 78.00	Jessica Balint	Paralegal
1/31/24	1.2	Attend Court	Tele IPTC (incl waiting for prev case to finish + email to OC after)	\$ 450.00	\$ 540.00	Penn Dodson	Partner
2/2/24	0.3	Process Electronic Court Documents	processed in court documents regarding discovery schedule	\$ 195.00	\$ 58.50	Jessica Balint	Paralegal
2/2/24	1.3	Calendar & Task Out All Deadlines/ Appearances/ Dates From Scheduling Order/CMO/TMO	calendared deadlines per case management order in both Asana and outlook	\$ 195.00	\$ 253.50	Jessica Balint	Paralegal
2/2/24	0.4	Admin - Review Deadlines Generally for 2 week Review of Upcoming Deadlines	with respect to new deadlines	\$ 195.00	\$ 78.00	Jessica Balint	Paralegal

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2/2/24	0.4	Read/review incoming email or correspondence	reviewed emails from handling attorney to substitute counsel	\$ 195.00	\$ 78.00	Jessica Balint	Paralegal
2/5/24	0.4	Telephone/Video Meeting	Call with Plaintiff Shkolir introducing self and the need for more information, paystubs, etc. Client will send them to us. Email to client so he can send me information.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
2/5/24	0.3	Telephone/Video Meeting	Call with Plaintiff Williams introducing self and the need for more information, paystubs, etc. Client will send them to us most likely will need to drop them off. Email to client so he can send me information or contact me with questions.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
2/5/24	0.5	Telephone/Video Meeting	Call with Plaintiff Badgaev and his translator introducing self and the need for more information, paystubs, etc. Email to client so he can send me information.	\$ 195.00	\$ 97.50	Lucy Espinal	Paralegal
2/6/24	0.3	Process Documents	Process in document from Plaintiff Badgaev regarding work performed on 12-18-20.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
2/6/24	0.5	Periodic Case Review	Read over case information from Penn and filings to get familiar with case.	\$ 195.00	\$ 97.50	Lucy Espinal	Paralegal
2/6/24	0.5	Draft document (other)	Set up Amended Complaint.	\$ 195.00	\$ 97.50	Lucy Espinal	Paralegal
2/6/24	0.3	Create/ Update Document Tracking Sheet	Update tracking sheet with information provided from Plaintiff Badgaev.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
2/6/24	0.3	Read/review incoming email or correspondence	Email from/to Plaintiff Williams regarding coordinating his sending additional documents to us.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
2/6/24	0.2	Compose/Send Email	Email to Plaintiff Shkolir regarding additional documents he is going to send us.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
2/6/24	0.5	Telephone/Video Meeting	Numerous telephone calls to several Staples in NY trying to find out if they'll scan documents for a client and charge our account.	\$ 195.00	\$ 97.50	Lucy Espinal	Paralegal
2/6/24	0.4	Book appointment/ schedule meeting (incl. reserving space etc. if applicable)	Email to opposing counsel with dates and times for a phone call with Penn; blocked time on calendar.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
2/7/24	0.4	Telephone/Video Meeting	Calls with UPS and Plaintiff Shkolir regarding scanning documents to send us.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
2/7/24	0.2	Compose/Send Email	Follow up email to opposing counsel on dates and times for call with Penn.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
2/7/24	0.4	Send/Receive Texts	Text messages to/from Plaintiffs Shkolir and Williams regarding documents they want to send us.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
2/8/24	0.4	Compose/Send Email	Email to opposing counsel regarding status of receiving their initial disclosures after reviewing file for the status of their initial disclosures.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
2/9/24	0.3	Compose/Send Email	Email to opposing counsel regarding scheduling call with Penn.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
2/9/24	0.3	Compose/Send Email	Email to opposing counsel enclosing another copy of Plaintiff's Initial Disclosures.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
2/9/24	1	Calendar & Task Out All Deadlines/ Appearances/ Dates From Scheduling Order/CMO/TMO	Review of upcoming Asana tasks (newly assigned case) and tasked & calendared subtasks to scheduling order deadlines.	\$ 195.00	\$ 195.00	Lucy Espinal	Paralegal
2/12/24	0.1	Send/Receive Texts	Text to Plaintiff Shkolir regarding status of his sending us his documents.	\$ 195.00	\$ 19.50	Lucy Espinal	Paralegal
2/12/24	0.5	Draft document (other)	Draft letter motion requesting extension of time to make settlement offer.	\$ 195.00	\$ 97.50	Lucy Espinal	Paralegal
2/13/24	0.3	Send/Receive Texts	Text message from/to Plaintiff Shkolir regarding the documents he's going to send us.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
2/13/24	0.4	Telephone/Video Meeting	Telephone calls with plaintiffs regarding status of documents they're sending us.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
2/14/24	0.3	Process Documents	Process in defendants' initial disclosures.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
2/14/24	0.2	Send/Receive Texts	Text message from/to Plaintiff William regarding documents he's shipped with UPS label we provided.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
2/14/24	0.2	Send/Receive Texts	Text message to Plaintiff Shkolir letting him know Penn did listen to the audio recording sent.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
2/16/24	0.5	Copy/Scan	Scan DISC DOX - Rashad Bank	\$ 45.00	\$ 22.50	Callyn Carter	Paralegal
2/16/24	0.3	Process Electronic Court Documents	Process in court minute order regarding clerk to assign case to a District Judge since MJ consent denied.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
2/16/24	0.3	Process Electronic Court Documents	Process in court docket text order assigning case to District Judge Orelia Merchant.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
2/16/24	0.2	LI40 Document/File Management	Update Clio with judge information and add judge's website to Asana.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
2/19/24	0.3	Read/review incoming email or correspondence	Email from opposing counsel regarding availability for meeting with Penn this week; Slack to attorney.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
2/19/24	0.1	Calendar & Task Out All Deadlines/ Appearances/ Dates From Scheduling Order/CMO/TMO	Task processing and organizing documents received from Plaintiff Williams.	\$ 195.00	\$ 19.50	Lucy Espinal	Paralegal
2/19/24	0.3	Compose/Send Email	Email to opposing counsel trying to schedule call with attorneys.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
2/20/24	0.4	Assemble / gather / collect documents together	Bookmark statements received from Plaintiff Williams.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
2/20/24	0.4	Process Electronic Court Documents	Process in court text orders regarding Motion to Certify FLSA Coll Action and Defendants' request for a pre-motion conference.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
2/21/24	0.3	Compose/Send Email	Follow up email to opposing counsel regarding scheduling call with Penn.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
2/21/24	0.5	Draft document (other)	Draft letter motion for extension of time to file amended complaint.	\$ 195.00	\$ 97.50	Lucy Espinal	Paralegal
2/22/24	0.2	Send/Receive Texts	Text to Ellie Shkolir checking on status of documents he's going to send us.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
2/22/24	0.2	Compose/Send Email	Follow up email to opposing counsel regarding phone call with Penn.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
2/23/24	0.4	Book appointment/ schedule meeting (incl. reserving space etc. if applicable)	Trying to find times and emails to/from opposing counsel to schedule call with Penn.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
2/26/24	0.3	Process Electronic Court Documents	Process in Court Minute Order referring Motion to Cert FLSA to Judge Kuo.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
2/26/24	0.4	Book appointment/ schedule meeting (incl. reserving space etc. if applicable)	Emails from/to opposing counsel to reschedule call with Penn.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
2/27/24	0.2	Compose/Send Email	Email to opposing counsel following up on times offered for a call with Penn.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
2/27/24	0.3	Process Electronic Court Documents	Process in Defendants' letter motion regarding extension of time for settlement demands.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
2/27/24	0.3	Send/Receive Texts	Text messages to/from Ellie regarding documents he just received and will be sending us.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
2/27/24	0.3	Edit Document	Edits to letter motion for extension of time and response to opposing counsel's motion for extension regarding the settlement offer.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
2/28/24	0.3	Process Electronic Court Documents	Process in Court Minute Order granting extension of time for demand and settlement offer.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
2/28/24	0.2	Send/Receive Texts	Text messages from/to Ellie regarding documents.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
2/28/24	0.3	File Document with Courts	File Letter Motion to Extend Time to Amend Complaint.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal

Date	Hours	Activity category	Description	Rate (\$)	Billable (\$)	User	Role
2/28/24	0.3	Process Electronic Court Documents	Process in filed motion; add to Slacky Asana.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
2/29/24	0.3	Compose/Send Email	Email from/to opposing counsel offering new dates for call with Penn.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
2/29/24	0.1	Send/Receive Texts	Text to Ellie asking status of sending us docs.	\$ 195.00	\$ 19.50	Lucy Espinal	Paralegal
3/1/24	0.4	Process Electronic Court Documents	Process in Court Text Order on motion for extension of time to file Amended Complaint; task and calendar out Defendant's response due date.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
3/4/24	0.3	Process Electronic Court Documents	Process in Defendant's filed response to our request for extension of time to file amended complaint.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
3/4/24	0.4	Process Electronic Court Documents	Process in court order on filing amended complaint; update tasks and deadlines calendar.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
3/5/24	0.4	Draft document (other)	Draft letter to judge regarding opposing counsel's consent or objection to our motion for leave to file amended complaint.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
3/5/24	0.5	Draft document (other)	Draft motion for leave to file amended complaint.	\$ 195.00	\$ 97.50	Lucy Espinal	Paralegal
3/5/24	0.4	Telephone/Video Meeting	Text messages and phone call with Ellie regarding the pics of documents he sent and need for him to scan or fax them to us ASAP.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
3/5/24	0.2	Research	Research judge's rules on motions.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
3/6/24	0.2	Send/Receive Texts	Text messages to/from Ellie regarding documents he's faxing us.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
3/6/24	0.1	Telephone/Video Meeting	Left voicemail for Ellie Shkolir regarding the fax we haven't received.	\$ 195.00	\$ 19.50	Lucy Espinal	Paralegal
3/7/24	0.3	Process Documents	Process in fully signed tolling agreement.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
3/7/24	0.2	Send/Receive Texts	Text messages to/from Ellie re documents he's faxing today.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
3/8/24	0.2	Compose/Send Email	Follow up email to opposing counsel on whether he consent or not to the motion to amend complaint.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
3/8/24	0.4	File Document with Courts	File Motion for Leave to File Amended Complaint and supporting documents with Court.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
3/8/24	0.4	Process Electronic Court Documents	Process in filed Motion for Leave to Amend Complaint and supporting documents.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
3/11/24	0.3	Process Electronic Court Documents	Process in Court Order on our Motion to Amend Complaint.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
3/13/24	0.3	Process Electronic Court Documents	Process in Defendants' Response to Plaintiffs' Motion for Leave to Amend Complaint.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
3/13/24	0.2	Document Review	Review Defendant's response to our Motion to Amend Complaint.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
3/14/24	0.3	Process Electronic Court Documents	Process in Court Text Order on filing Amended Complaint and response to Defendants' pre-motion conference request.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
3/14/24	0.4	Calendar & Task Out All Deadlines/ Appearances/ Dates From Scheduling Order/CMO/TMO	Task and calendar out filing Amended Complaint and deadline to file our response to Defendants' pre-motion conference request.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
3/15/24	0.3	File Document with Courts	Finalize and file First Amended Complaint.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
3/15/24	0.5	Draft document (other)	Draft response letter motion to Defendants' pre-motion for conference request.	\$ 195.00	\$ 97.50	Lucy Espinal	Paralegal
3/15/24	0.4	Compose/Send Email	Emails to Plaintiffs with copy of filed Amended Complaint.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
3/15/24	0.3	Process Electronic Court Documents	Process in filed Amended Complaint.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
3/18/24	0.3	Calendar & Task Out All Deadlines/ Appearances/ Dates From Scheduling Order/CMO/TMO	Email from opposing counsel regarding his requesting settlement demand by Thursday at noon; task on calendar and Asana.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
3/18/24	0.5	Book appointment/ schedule meeting (incl. reserving space etc. if applicable)	Emails from/to Plaintiff Williams; scheduled call with Penn for Wednesday; review of CDOX for text messages he referred to in his email. Slacked information to Penn on topic of call.	\$ 195.00	\$ 97.50	Lucy Espinal	Paralegal
3/19/24	0.3	File Document with Courts	File our Response to Defendant's Pre-Motion for Conference request.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
3/19/24	0.3	Process Electronic Court Documents	Process in filed Response to Defendants' Pre-Motion for Conference Request.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
3/19/24	1.1	Edit Document	Letter motion response re Ds prp MTD. Review Ds' letter. Look up DJ's indiv rules. Review allegations in complaints.	\$ 450.00	\$ 495.00	Penn Dodson	Partner
3/20/24	0.1	Telephone/Video Meeting	Telephone call with Rashad reminding him of Zoom call today with Penn.	\$ 195.00	\$ 19.50	Lucy Espinal	Paralegal
3/20/24	0.3	Calendar & Task Out All Deadlines/ Appearances/ Dates From Scheduling Order/CMO/TMO	Task out subpoena and getting information from Plaintiff Rashad's phone.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
3/20/24	0.2	Call	Shkolir - call w/P Rashad Williams 00799 Shkolir v RX2GO	\$ 450.00	\$ 90.00	Penn Dodson	Partner
3/21/24	0.4	Process Electronic Court Documents	Process in Court Docket Text Order and task out.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
3/21/24	0.4	Draft document (other)	Set up court appearance form	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
3/21/24	0.3	Read/review incoming email or correspondence	Read emails between attorneys regarding court's text order to contact court tomorrow.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
3/21/24	0.4	Compose/Send Email	Review OEM's order, consider how to handle, draft prp joint EM to PK + send to OC	\$ 450.00	\$ 180.00	Penn Dodson	Partner
3/22/24	0.2	Calendar & Task Out All Deadlines/ Appearances/ Dates From Scheduling Order/CMO/TMO	Task and calendar Defendants' responses to our Request for Production of Documents deadline.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
3/22/24	1	Draft document (other)	Draft subpoena packet for Telegram, research online for Telegram information and address.	\$ 195.00	\$ 195.00	Lucy Espinal	Paralegal
3/22/24	0.8	Edit Document	Ps Response to Ds Pre-Motion Conf Request	\$ 450.00	\$ 360.00	Penn Dodson	Partner
3/22/24	0.5	L310 Written Discovery	Draft limited 1st RPDs to Ds + EM to OC	\$ 450.00	\$ 225.00	Penn Dodson	Partner
3/22/24	0.1	Compose/Send Email	Resp to OC's threatening em, suggest call at 3pm	\$ 450.00	\$ 45.00	Penn Dodson	Partner
3/22/24	0.6	Communicate	Conferral call w OC. FU EM to chambers.	\$ 450.00	\$ 270.00	Penn Dodson	Partner
3/23/24	0.2	Call	Shkolir: Penn Dodson to call Emanuel Kataev(917) 807-7819 00799 Shkolir v RX2GO	\$ 450.00	\$ 90.00	Penn Dodson	Partner
3/23/24	0.2	Call	Jointly contact MJ Kuo to schedule an initial conf and/or settlement conference	\$ 450.00	\$ 90.00	Penn Dodson	Partner
3/25/24	0.3	Process Electronic Court Documents	Process in filed joint letter motion.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
3/25/24	0.3	Process Electronic Court Documents	Process in Court Text Order regarding scheduling order and deadlines.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
3/25/24	0.4	Calendar & Task Out All Deadlines/ Appearances/ Dates From Scheduling Order/CMO/TMO	Task and calendar out new deadlines from Court Order.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
3/26/24	0.3	Compose/Send Email	Follow up email to opposing counsel regarding mediation.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
3/29/24	0.3	Edit Document	[DUE 3/29] Finish/proofread dmd ltr + propound to OC	\$ 450.00	\$ 135.00	Penn Dodson	Partner

Date	Hours	Activity category	Description	Rate (\$)	Billable (\$)	User	Role
3/29/24	0.4	Compose/Send Email	Mediation related: Research mediator OC suggested, rsrch other mediators, review prp date + suggest others, EM OC	\$ 450.00	\$ 180.00	Penn Dodson	Partner
4/1/24	0.3	Compose/Send Email	Follow up email to opposing counsel regarding mediator.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
4/1/24	0.1	Edit Document	rvw/edit subpoena to Telegram	\$ 450.00	\$ 45.00	Penn Dodson	Partner
4/3/24	0.5	Research	Research Telegram address for service	\$ 150.00	\$ 75.00	Callyn Carter	Paralegal
4/4/24	0.3	Compose/Send Email	Follow up email to opposing counsel on mediator selection.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
4/8/24	0.3	Read/review incoming email or correspondence	Email from opposing counsel regarding counter demand; Slack to channel.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
4/8/24	0.2	Send/Receive Texts	Text to Rashad asking about text messages.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
4/11/24	0.3	Compose/Send Email	Follow up email to opposing counsel on Penn's email regarding mediation.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
4/12/24	0.1	Read/review incoming email or correspondence	Read email from Penn to opposing counsel regarding status and mediation.	\$ 195.00	\$ 19.50	Lucy Espinal	Paralegal
4/15/24	0.2	Read/review incoming email or correspondence	Read emails between attorneys.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
4/16/24	0.2	Compose/Send Email	Follow up email to opposing counsel regarding selection of mediator and mediation scheduling.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
4/16/24	0.2	Communicate	Internal communication regarding the status of case and emails regarding mediation.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
4/17/24	0.3	Compose/Send Email	Email from/to opposing counsel regarding mediation and Penn's answer to his previous question.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
4/23/24	0.2	Communicate	Internal communication on status of case and when defendants' responses to our Request for Production of Documents are due.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
4/26/24	0.3	Telephone/Video Meeting	Telephone call with client regarding status update, issues he's having with his taxes and his request for a name of a tax attorney.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
4/26/24	0.2	Communicate	Review to make sure then EM OC as to his complete lack of response to our RPDs sent 3/22	\$ 450.00	\$ 90.00	Penn Dodson	Partner
4/29/24	0.3	Draft document (other)	Set up letter to judge on discovery deficiencies.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
4/29/24	0.1	Telephone/Video Meeting	Phone call with client regarding bankruptcy attorney.	\$ 195.00	\$ 19.50	Lucy Espinal	Paralegal
4/29/24	0.2	Send/Receive Texts	Texts to/from client with name of a bankruptcy attorney.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
4/29/24	1	Edit Document	Edits to motion letter since Defendants filed letter motion requesting pre-motion conference.	\$ 195.00	\$ 195.00	Lucy Espinal	Paralegal
4/29/24	0.3	Process Electronic Court Documents	Process in Defendants' letter motion requesting pre-motion conference.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
4/29/24	0.3	Calendar & Task Out All Deadlines/ Appearances/ Dates From Scheduling Order/CMO/TMO	Task/calendar our response to Defendants' letter motion.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
4/30/24	0.4	File Document with Courts	Finalize and file letter motion requesting pre-motion conference on discovery deficiencies and exhibit.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
4/30/24	0.3	Process Electronic Court Documents	Process in letter motion to judge for pre-motion conference regarding discovery deficiencies.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
4/30/24	0.2	Send/Receive Texts	Text messages to/from Rashad regarding getting texts off his phone.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
4/30/24	0.3		edit ltr motion re DS disc nonproduction	\$ 450.00	\$ 135.00	Penn Dodson	Partner
5/1/24	0.3	Process Electronic Court Documents	Process in Court Text Order on Defendants response to our letter motion due date.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
5/1/24	0.2	Calendar & Task Out All Deadlines/ Appearances/ Dates From Scheduling Order/CMO/TMO	Task and calendar Defendants' response to our letter motion.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
5/1/24	0.5	Draft document (other)	Set up response letter to Defendant's renewed request for pre-motion conference.	\$ 195.00	\$ 97.50	Lucy Espinal	Paralegal
5/2/24	0.3	Send/Receive Texts	Text messages from/to Rashad regarding text messages on his phone.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
5/2/24	0.2	Telephone/Video Meeting	Telephone call with Rashad regarding Telegram.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
5/2/24	0.2	Research	Look up judge's individual practices for responding to letter motion.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
5/6/24	0.3	Send/Receive Texts	Texts from/to Plaintiff Rashad regarding getting texts from Telegram app.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
5/6/24	0.3	Compose/Send Email	Email to Bespoke to see if they can assist client with getting information from Telegram.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
5/6/24	0.5	Compose/Send Email	Emails to/from Bespoke regarding getting Telegram information from Plaintiff Rashad.	\$ 195.00	\$ 97.50	Lucy Espinal	Paralegal
5/6/24	0.4	File Document with Courts	Finalize and file letter motion in response to Defendants' letter motion requesting pre-motion conference.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
5/6/24	0.3	Process Electronic Court Documents	Process in our filed letter motion.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
5/7/24	0.4	Process Documents	Receipt, review and process in opposing counsel's response to our letter motion regarding discovery deficiencies.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
5/7/24	0.3	Process Electronic Court Documents	Process in Court Text Order referring letter motions and collective cert motion to Judge Kuo.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
5/8/24	0.3	Read/review incoming email or correspondence	Email from Bespoke re Telegram; Slack information to atty.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
5/10/24	0.3	Process Electronic Court Documents	Process in Court Minute Order scheduling pre-motion conference on both requests for 5/17.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
5/10/24	0.5	Calendar & Task Out All Deadlines/ Appearances/ Dates From Scheduling Order/CMO/TMO	Calendar and task out pre-motion conference on both requests for 5/17 for Penn and Will; block travel times.	\$ 195.00	\$ 97.50	Lucy Espinal	Paralegal
5/13/24	0.4	Draft document (other)	Draft court appearance form for pre-motion conference on 5/17.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
5/13/24	0.1	Manage/Delegate/Assign	Block time for attorney to prepare for pre-motion conference	\$ 195.00	\$ 19.50	Lucy Espinal	Paralegal
5/14/24	0.4	Periodic Case Review	Checked status of discovery as deadline to exchange first round is in 2 weeks; Slack information to attorney if we need to get those ready to go out.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
5/14/24	0.1	Communicate	Internal communication on status of case and following up on tasks after the pre-motion conference on Friday.	\$ 195.00	\$ 19.50	Lucy Espinal	Paralegal
5/14/24	0.5		Prep for court appearance	\$ 450.00	\$ 225.00	Penn Dodson	Partner

Date	Hours	Activity category	Description	Rate (\$)	Billable (\$)	User	Role
5/16/24	0.5	Send/Receive Texts	Several text messages from/to Ellie regarding tax attorney referral; check with attorney for any other possible attorneys; check CO Bar Association phone number and cite for Ellie.	\$ 195.00	\$ 97.50	Lucy Espinal	Paralegal
5/17/24	0.3	Process Electronic Court Documents	Process in Court Order on discovery deficiencies, mediation and collective cert.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
5/17/24	0.5	Calendar & Task Out All Deadlines/ Appearances/ Dates From Scheduling Order/CMO/TMO	Calendar and task out new and updated deadlines from Court Order on discovery deficiencies, mediation and collective cert.	\$ 195.00	\$ 97.50	Lucy Espinal	Paralegal
5/17/24	0.5		Shkolir: Pre-Motion Conf (Disc Deficiencies y MTD) In Person	\$ 450.00	\$ 225.00	Penn Dodson	Partner
5/17/24	0.4		Local travel to/from EDNY for court appearance	\$ 450.00	\$ 180.00	Penn Dodson	Partner
5/17/24	0.4		Local travel to/from EDNY for court appearance	\$ 450.00	\$ 180.00	Penn Dodson	Partner
5/17/24	0.8	Document Review	Reviewing file in prep for court hearing 5/17	\$ 195.00	\$ 156.00	Will Castelli	Law Clerk
5/17/24	0.9	Travel	to and from federal courthouse in Brooklyn	\$ 200.00	\$ 180.00	Will Castelli	Law Clerk
5/17/24	1	Attend Court	Pre-Motion Conf (Disc Deficiencies y MTD) In Person	\$ 195.00	\$ 195.00	Will Castelli	Law Clerk
5/20/24	0.8	Process Documents	Organize CLs bank statements/combine files for PD to produce to OC	\$ 150.00	\$ 120.00	Callyn Carter	Paralegal
5/20/24	0.4	Draft document (other)	Set up updated demand letter; Slack to attorney for editing.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
5/20/24	0.3	Read/review incoming email or correspondence	Read email from attorney to possible additional plaintiff; task to follow up.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
5/20/24	2.2		Data analysis based on summary data D1-D14 OC just sent over.	\$ 450.00	\$ 990.00	Penn Dodson	Partner
5/20/24	0.3		addl PNC ready to move fwd - email him	\$ 450.00	\$ 135.00	Penn Dodson	Partner
5/21/24	0.1	Communicate	Internal communication regarding status of case and holding off on discovery until after mediation.	\$ 195.00	\$ 19.50	Lucy Espinal	Paralegal
5/22/24	0.4	Compose/Send Email	Emails to/from opposing counsel regarding selection of a mediator.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
5/22/24	0.4	Compose/Send Email	Phone call (voicemail) and follow up email to Mediator Kheel to see if he would be interested in mediating the case.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
5/23/24	0.3	Read/review incoming email or correspondence	Email from mediator regarding his schedule; Slack information to attorney to see next steps.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
5/23/24	0.3	Telephone/Video Meeting	Telephone call with Badmaev Sangadzi regarding joining the case.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
5/23/24	0.2	Manage/Delegate/Assign	Tasked to follow up on additional plaintiff's LSA; informed attorney he wants to join.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
5/23/24	0.5	Compose/Send Email	Emails to/from mediator regarding his mediating the case, availability and it whether in person or virtual.	\$ 195.00	\$ 97.50	Lucy Espinal	Paralegal
5/24/24	0.3	Compose/Send Email	Email to mediator and opposing counsel regarding possible dates for mediation.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
5/24/24	0.2	Book appointment/ schedule meeting (incl. reserving space etc. if applicable)	Blocked dates on attorney's calendar for mediation.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
5/28/24	0.4	Compose/Send Email	Email from to opposing counsel requesting and sending preliminary email thread to mediator if he would accept mediating the case.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
5/28/24	0.2	Read/review incoming email or correspondence	Read updated demand to Defendants; save pdf to file.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
5/28/24	0.1	Communicate	Internal communication regarding status of case and opposing counsel hasn't responded to dates for mediation.	\$ 195.00	\$ 19.50	Lucy Espinal	Paralegal
5/28/24	0.8	Edit Document	Ps to provide Ds a demand based on the 3 Ps	\$ 450.00	\$ 360.00	Penn Dodson	Partner
5/29/24	0.2	Send/Receive Texts	Follow up text to Sangadzi regarding the case.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
5/29/24	0.5	Draft document (other)	Draft letter motion to Judge requesting extension of time to complete mediation.	\$ 195.00	\$ 97.50	Lucy Espinal	Paralegal
5/29/24	0.3	Manage/Delegate/Assign	Assign tasks on letter motion requesting extension of time to complete mediation.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
5/29/24	0.4	Send/Receive Texts	Text messages to each plaintiff regarding possible dates for mediation.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
5/29/24	0.2	Compose/Send Email	Follow up email to opposing counsel regarding dates offered for mediation.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
5/30/24	0.4	Compose/Send Email	Email to opposing counsel with letter to judge requesting extension of time for mediation for his consent; task to follow up.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
5/30/24	0.2	Telephone/Video Meeting	Telephone call with court on where to file the request for extension to complete mediation.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
5/30/24	0.4	File Document with Courts	Finalize and file letter motion for extension of time to complete mediation.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
5/30/24	0.3	Process Electronic Court Documents	Process in filed letter motion for extension of time to complete mediation.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
5/30/24	0.4	Telephone/Video Meeting	Telephone call from Ellie regarding mediation and his concerns about his taxes since Defendants haven't provided the correct tax information for him to file.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
5/30/24	0.4	Compose/Send Email	Email to Ellie with tax form questions information sheet containing links for the IRS; reviewed file and documents previously produced but he hadn't sent us 1099s.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
5/30/24	0.3	Process Electronic Court Documents	Process in Court Order granting motion for extension to complete mediation.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
5/30/24	0.4	Calendar & Task Out All Deadlines/ Appearances/ Dates From Scheduling Order/CMO/TMO	Update calendar and tasks with new dates on Court Order granting extension for mediation.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
6/3/24	0.3	Telephone/Video Meeting	Telephone call with additional plaintiff regarding signing LSA and payment; Slack information to attorney.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
6/3/24	0.2	Read/review incoming email or correspondence	Email from opposing counsel with Defendants' settlement offer; Slack to attorney and save to file.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
6/4/24	0.3	Telephone/Video Meeting	Telephone call with additional Plaintiff regarding payment after communicating internally that we received his LSA but not payment yet.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
6/5/24	0.1	Telephone/Video Meeting	Telephone call with additional plaintiff regarding his payment.	\$ 195.00	\$ 19.50	Lucy Espinal	Paralegal
6/6/24	0.3	Communicate	Internal communication regarding additional plaintiff's payment.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
6/6/24	0.2	Read/review incoming email or correspondence	Receipt and review of email from attorney to opposing counsel and task to follow up.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
6/6/24	0.2		Check status on paper dox - EM OC about that and new P	\$ 450.00	\$ 90.00	Penn Dodson	Partner
6/7/24	0.2	Compose/Send Email	Email to opposing counsel regarding he hasn't responded to the dates the mediator offered.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
6/11/24	0.2	Compose/Send Email	Follow up email to opposing counsel on Penn's email requesting documents.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
6/11/24	0.3	Periodic Case Review	Check where we are with scheduling mediation and if proposed dates are still available as opposing counsel hasn't responded to dates offered.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal

Date	Hours	Activity category	Description	Rate (\$)	Billable (\$)	User	Role
6/11/24	0.3	Compose/Send Email	Follow up email to opposing counsel regarding attorney's email on additional plaintiff.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
6/13/24	0.4	Read/review incoming email or correspondence	Emails from/to opposing counsel on date for mediation.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
6/13/24	0.3	Read/review incoming email or correspondence	Emails from opposing counsel on additional plaintiff and documents he will produce next week.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
6/14/24	0.1	Research	Review Judge's rules on mediation.	\$ 195.00	\$ 19.50	Lucy Espinal	Paralegal
6/14/24	0.3	Manage/Delegate/Assign	Assign and task out filing notice of mediation, confidentiality form and post mediation report.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
6/14/24	0.4	Draft document (other)	Draft Notice of Mediation; task attorney to review.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
6/14/24	0.5	Telephone/Video Meeting	Telephone call with Plaintiffs and text messages letting them know about the mediation on July 15 and they'll get a letter with more information next week.	\$ 195.00	\$ 97.50	Lucy Espinal	Paralegal
6/14/24	0.2	Telephone/Video Meeting	Telephone call with Rashad with questions he has on mediation and another matter; relayed message to Brissa.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
6/14/24	0.1		review/edit notice of mediation	\$ 450.00	\$ 45.00	Penn Dodson	Partner
6/18/24	0.2	Compose/Send Email	Follow up email to opposing counsel and mediator to confirm start time of mediation.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
6/18/24	0.5	Draft document (other)	Draft Consent to Join for additional plaintiff; read email from Penn to opposing counsel on consent to joint.	\$ 195.00	\$ 97.50	Lucy Espinal	Paralegal
6/18/24	0.4	Obtain/Secure Signature (RA/SA/Decl/Aff)	Sent Consent to Join form to additional plaintiff for signature.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
6/18/24	0.1	Send/Receive Texts	Text to additional plaintiff letting him know the Consent to Join form was sent to him for signature via Docusign.	\$ 195.00	\$ 19.50	Lucy Espinal	Paralegal
6/18/24	0.5	Obtain/Secure Signature (RA/SA/Decl/Aff)	Process in Consent to Join and resent since client didn't put dates of employment; texts to/from client regarding dates of employment section.	\$ 195.00	\$ 97.50	Lucy Espinal	Paralegal
6/18/24	0.4	Process Documents	Process in signed Consent to Join from additional plaintiff; text messages to/from client regarding resigning.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
6/18/24	0.2	Manage/Delegate/Assign	Task and assign ex parte statement, and getting confidentiality form completed, signed and submitted.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
6/18/24	0.4	Draft document (other)	Set up Remote Confidentiality Agreement and Stipulation with added signatures for everyone.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
6/18/24	0.3	Edit Document	edit consent to join; convey new P info to OC	\$ 450.00	\$ 135.00	Penn Dodson	Partner
6/19/24	0.1	L140 Document/File Management	Update Clio with mediation information date, time and mediator.	\$ 195.00	\$ 19.50	Lucy Espinal	Paralegal
6/19/24	0.3	Draft document (other)	Draft Mediation Agreement Term Sheet	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
6/19/24	0.3	File Document with Courts	File Consent to Join of additional plaintiff Badmaev.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
6/19/24	0.3	Process Electronic Court Documents	Process in filed Consent to Join of additional plaintiff Badmaev.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
6/20/24	0.3	Compose/Send Email	Follow up email to opposing counsel and mediator to confirm date/time of mediation so we can inform the court.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
6/21/24	0.4	Obtain/Secure Signature (RA/SA/Decl/Aff)	Sent confidentiality statement out to Plaintiffs for review and signature through Docusign.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
6/21/24	0.3	Send/Receive Texts	Text messages to each plaintiff letting them know the confidentiality agreement was sent to them via Docusign for signature.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
6/24/24	0.3	Send/Receive Texts	Text from Plaintiff Sangadzhi regarding signing Confidentiality Stipulation; check to see who has signed; sent text to Plaintiff Evgenii reminding him to read and sign.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
6/24/24	0.4	Telephone/Video Meeting	Telephone call with Plaintiff Evgenii and his interpreter regarding his signing the confidentiality stipulation.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
6/24/24	0.4	Process Documents	Process in Confidentiality Stipulation signed by Plaintiffs; add Penn's signature to it; save to file and Asana.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
6/24/24	0.4	Draft document (other)	Draft court appearance form for mediation.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
6/25/24	0.3	Read/review incoming email or correspondence	Receipt and review of email from opposing counsel with additional documents; task Callyn to process in and attorney to review; Slack to channel.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
6/25/24	0.4	Analysis/ Substantive Review	Review the ~1200 pg production to see what it is; strategize/task out how to process it	\$ 450.00	\$ 180.00	Penn Dodson	Partner
6/25/24	1.6	Analysis/ Substantive Review	Analysis of ~1200 pg doc production, start building out spreadsheet from it	\$ 450.00	\$ 720.00	Penn Dodson	Partner
6/25/24	0.3	Draft document (other)	creating spreadsheet for new cdox	\$ 195.00	\$ 58.50	Will Castelli	Law Clerk
6/26/24	1	Draft document (other)	Set up ex parte mediation statement; put demand letter and amended complaint together; add links to offers made into the statement for attorney's reference.	\$ 195.00	\$ 195.00	Lucy Espinal	Paralegal
6/26/24	0.2	Manage/Delegate/Assign	Task Penn to edit mediation documents; block time on her calendar to prepare for mediation; read letter from Penn to opposing counsel regarding discovery items still not provided; task self to follow up.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
6/26/24	0.5		[Atty] Once offer made by other side, add tab to negotiation spreadsheet & enter info	\$ 450.00	\$ 225.00	Penn Dodson	Partner
6/27/24	0.3	Compose/Send Email	Email to mediator requesting what time he would like to start the mediation so we can let our clients know.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
6/28/24	0.2	Read/review incoming email or correspondence	Read email from mediator regarding mediation; Slack information to attorney.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
7/1/24	0.3	Read/review incoming email or correspondence	Email from mediator confirming 7/15 mediation beginning at 10 am and ex parte statements due 7/8; Slack information to attorney.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
7/1/24	0.4	Read/review incoming email or correspondence	Receipt and review of mediator's letter of engagement for mediation; process in; task attorney to review.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
7/1/24	0.8	Draft document (other)	Draft letter to judge regarding mediation and Defendants' continued discovery deficiencies with procedural history and links to documents.	\$ 195.00	\$ 156.00	Lucy Espinal	Paralegal
7/2/24	0.3	Compose/Send Email	Checked for response from clients to Penn's email of 6/27; sent follow up email regarding same.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
7/2/24	0.3	Telephone/Video Meeting	Telephone call with Rashad regarding his response to Penn's email on the timestamped document sent.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
7/2/24	0.4	Read/review incoming email or correspondence	Emails from/to Rashad Williams regarding pictures he's sending.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal

Date	Hours	Activity category	Description	Rate (\$)	Billable (\$)	User	Role
7/3/24	0.4	Compose/Send Email	Receipt and review of emails from Rashad with additional pictures; forward to and task Callyn for processing.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
7/5/24	0.1	Read/review incoming email or correspondence	Receipt and review of email from Plaintiff Sangadzh; Slack to attorney.	\$ 195.00	\$ 19.50	Lucy Espinal	Paralegal
7/5/24	0.2	Edit Document	Edit mediator letter of engagement to include Penn's signature.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
7/5/24	0.4	File Document with Courts	Finalize and file letter with court on discovery deficiencies for mediation.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
7/5/24	0.3	Process Electronic Court Documents	Process in filed Letter tetter and exhibit; task to follow up.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
7/5/24	0.1	Telephone/Video Meeting	Phone call with Evgenii Badgaev regarding the need for an interpreter for the mediation.	\$ 195.00	\$ 19.50	Lucy Espinal	Paralegal
7/5/24	1		Assess where we are in light of disc disputes, upcoming mediation, etc.; edit ltr to judge asking for order for production by 7/10	\$ 450.00	\$ 450.00	Penn Dodson	Partner
7/5/24	0.6		work on ex parte mediation statement	\$ 450.00	\$ 270.00	Penn Dodson	Partner
7/5/24	0.2		Shkolir: Prep for Mediation - work on Ex Parte Statement, CAFMEDIATION 20240715 CAF - Mediation (Shkolir).docx 00799 Shkolir v RX2GO	\$ 450.00	\$ 90.00	Penn Dodson	Partner
7/5/24	0.1		Review mediator's letter of engagement - let Lucy know its ok	\$ 450.00	\$ 45.00	Penn Dodson	Partner
7/8/24	0.3	Compose/Send Email	Email to mediator with signed remote confidentiality stipulation and signed letter of engagement.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
7/8/24	0.2	Telephone/Video Meeting	Phone call with Sangadzh Badmaev regarding mediation next week and translating for Evgenii.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
7/8/24	0.3	Process Electronic Court Documents	Process in Court Order regarding our motion for discovery.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
7/8/24	0.3	Assemble / gather / collect documents together	Gather and prepare exhibits for ex parte mediation statement.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
7/8/24	0.3	Compose/Send Email	Email to mediator with ex parte mediation statement and attachments.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
7/9/24	0.5	Telephone/Video Meeting	Telephone calls with each Plaintiff to go over mediation and Zoom.	\$ 195.00	\$ 97.50	Lucy Espinal	Paralegal
7/9/24	0.3	Book appointment/ schedule meeting (incl. reserving space etc. if applicable)	Schedule practice Zoom calls with two plaintiffs to prepare for mediation zoom.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
7/9/24	0.8	Draft document (other)	Preparation of letters to four plaintiffs on what to expect at mediation.	\$ 195.00	\$ 156.00	Lucy Espinal	Paralegal
7/9/24	0.5	Compose/Send Email	Emails to four plaintiffs with letters on mediation and link to watch regarding what to expect at mediation; reminding two of them of our practice zoom tomorrow.	\$ 195.00	\$ 97.50	Lucy Espinal	Paralegal
7/10/24	0.5	Telephone/Video Meeting	Zoom meeting with Plaintiff Ellie to run through the Zoom process and discuss mediation.	\$ 195.00	\$ 97.50	Lucy Espinal	Paralegal
7/10/24	0.2	Telephone/Video Meeting	Zoom meeting with Plaintiff Evgenii to prepare for Monday's mediation.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
7/10/24	0.4	File Document with Courts	Finalize and file Notice of Mediation, selection of mediator.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
7/10/24	0.3	Process Electronic Court Documents	Process in filed Notice of Mediation.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
7/10/24	0.1	Calendar & Task Out All Deadlines/ Appearances/ Dates From Scheduling Order/CMO/TMO	Task out to send confidentiality stipulation to court and mediation report.	\$ 195.00	\$ 19.50	Lucy Espinal	Paralegal
7/10/24	0.2	Telephone/Video Meeting	Telephone call from mediator regarding mediation Monday and setting up a call with Penn beforehand.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
7/11/24	0.3	Compose/Send Email	Email to mediator on if he's going to send the Zoom link for Monday's mediation.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
7/12/24	0.4	Book appointment/ schedule meeting (incl. reserving space etc. if applicable)	Schedule Zoom call between Penn and mediator.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
7/12/24	0.2	Read/review incoming email or correspondence	Receipt and review of email from mediator with Zoom link for Monday's mediation.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
7/12/24	0.4	Compose/Send Email	Email to Plaintiffs with Zoom link for Monday's mediation.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
7/12/24	0.4	Telephone/Video Meeting	Telephone calls with Plaintiffs confirming they received the Zoom Link for Monday.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
7/12/24	0.3	Edit Document	Edits to court appearance form for mediation.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
7/12/24	0.3	Compose/Send Email	Email to court with copy of the Confidentiality Stipulation signed by Plaintiffs and Penn.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
7/12/24	0.2	Send/Receive Texts	Text to/from Plaintiff Evgenii regarding Zoom link for Monday.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
7/12/24	0.5		Shkolir v Rx2GO Call with Mediator Robert Kheel	\$ 450.00	\$ 225.00	Penn Dodson	Partner
7/14/24	4.1	Analysis/ Substantive Review	Review/ analyze dox OC sent over Fri eve in prep for Mon mediation	\$ 450.00	\$ 1,845.00	Penn Dodson	Partner
7/15/24	0.1	Read/review incoming email or correspondence	Receipt and review of email from mediator canceling today's mediation.	\$ 195.00	\$ 19.50	Lucy Espinal	Paralegal
7/15/24	0.4	Send/Receive Texts	Text messages to Plaintiffs of cancelation of today's mediation.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
7/15/24	0.3	Process Electronic Court Documents	Process in Defendants' response to our letter motion on discovery.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
7/15/24	0.2	Telephone/Video Meeting	Telephone call with Plaintiff Evgenii re cancelation of today's mediation.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
7/15/24	0.3	Read/review incoming email or correspondence	Receipt and review of texts from clients and email from attorney to clients regarding cancellation of mediation.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
7/15/24	0.6	Prep work/ Prepare for and attend	Prep for zoom mediation; learn it'd been cxld due to mediator illness; email clients; task out next steps	\$ 450.00	\$ 270.00	Penn Dodson	Partner
7/16/24	0.3	Compose/Send Email	Email to mediator and opposing counsel offering other dates for mediation.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
7/17/24	0.3	Compose/Send Email	Receipt and review of email from mediator agreeing to dates offered; task to follow up for response from opposing counsel on dates.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
7/18/24	0.3	Compose/Send Email	Email from/to Rashad regarding rescheduling the mediation.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
7/18/24	6	Data Entry	Data entry of PDFs into spreadsheet for analysis	\$ 125.00	\$ 750.00	Penn Dodson	Partner
7/19/24	0.3	Compose/Send Email	Read emails between attorneys regarding rescheduling mediation; internal communication with Brissa to clear calendar for that date.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
7/19/24	0.4	Compose/Send Email	Email and texts to plaintiffs letting them know of new date for mediation.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
7/22/24	0.3	Process Electronic Court Documents	Process in Court Minute Order re Plaintiffs are to file a letter by Friday on Defendants' outstanding discovery.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
7/22/24	0.3	Calendar & Task Out All Deadlines/ Appearances/ Dates From Scheduling Order/CMO/TMO	Calendar and task out Court Order re: filing Plaintiffs letter.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal

Date	Hours	Activity category	Description	Rate (\$)	Billable (\$)	User	Role
7/22/24	0.3	Read/review incoming email or correspondence	Receipt and review of email from mediator with the Zoom link for tomorrow's mediation.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
7/22/24	0.2	Edit Document	Edit court appearance form with Zoom link; Slack to attorney.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
7/22/24	0.5	Compose/Send Email	Several emails to/from clients with new Zoom link for mediation; several texts to/from clients regarding attendance of mediation.	\$ 195.00	\$ 97.50	Lucy Espinal	Paralegal
7/22/24	0.4	Draft document (other)	Set up letter to Court regarding Defendants' outstanding discovery; link previous documents to letter.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
7/22/24	0.2	Telephone/Video Meeting	Telephone call with Evgenii regarding mediation tomorrow.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
7/22/24	6.3	Analysis/ Substantive Review	continue data analysis	\$ 450.00	\$ 2,835.00	Penn Dodson	Partner
7/23/24	0.3	Send/Receive Texts	Text messages from/to Plaintiff Sangadzhli regarding connecting to Zoom link.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
7/23/24	0.4	Draft document (other)	Draft joint status report on mediation; task attorney to edit.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
7/23/24	0.2	Communicate	Internal communication regarding status of case, result of today's mediation and next steps.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
7/23/24	4	L160 Settlement/Non-Binding ADR	Mediation	\$ 450.00	\$ 1,800.00	Penn Dodson	Partner
7/23/24	0.8	L210 Pleadings	Work on amending cpit	\$ 450.00	\$ 360.00	Penn Dodson	Partner
7/23/24	0.1	Communicate	slacking w Penn re attending mediation	\$ 195.00	\$ 19.50	Will Castelli	Law Clerk
7/23/24	3	Appear for/attend	Attended mediation w Penn	\$ 195.00	\$ 585.00	Will Castelli	Law Clerk
7/23/24	0.1	Communicate	slacking w Penn re notes from mediation, new memo on MCA and Bilyou	\$ 195.00	\$ 19.50	Will Castelli	Law Clerk
7/24/24	0.4	Process Documents	Receipt and review of email from mediator with letter and invoice; process in letter and invoice.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
7/24/24	0.3	Manage/Delegate/Assign	Assign Luisa to pay invoice; task to follow up on payments.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
7/24/24	0.2	Read/review incoming email or correspondence	Read email from Penn to Ellie re IQ data and task self to follow up with Ellie.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
7/24/24	0.4	Telephone/Video Meeting	Telephone call with Ellie Shkolir re documents he sent, mediation and Chase Bank.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
7/24/24	0.4	Research	Research legal department for JP Morgan Chase Bank address to send subpoena; review file for corporation information on Victoria NYC I Inc. and RX2GO	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
7/24/24	0.5	Draft document (other)	Draft subpoena and attachments to JP Morgan Chase Bank.	\$ 195.00	\$ 97.50	Lucy Espinal	Paralegal
7/25/24	0.3	File Document with Courts	Finalize and file joint status report result of mediation.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
7/25/24	0.2	Read/review incoming email or correspondence	Read email from Penn to Plaintiff Ellie; task to follow for a response from him.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
7/25/24	0.3	Process Electronic Court Documents	Process in filed joint status report on result of mediation.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
7/25/24	0.4		Ps' Reply Letter to Court re Outstanding Discovery Due	\$ 450.00	\$ 180.00	Penn Dodson	Partner
7/26/24	0.4	File Document with Courts	Proof, finalize and file reply letter motion regarding outstanding discovery.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
7/26/24	0.4	Draft document (other)	Draft letter motion with proposed briefing schedule for Motion to Amend Complaint and Defendants Motion for Judgment on the Pleadings.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
7/26/24	0.3	Manage/Delegate/Assign	Pull parent task on Amending Complaint and task out letter motion on briefing schedule.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
7/30/24	0.2	Read/review incoming email or correspondence	Read emails between attorney and Plaintiff Ellie regarding his company and time worked at RX2Go.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
7/30/24	0.2	Communicate	Internal communication regarding status of case and next steps.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
7/30/24	1.9	Research	MCA research for memo	\$ 195.00	\$ 370.50	Will Castelli	Law Clerk
7/31/24	0.3	Communicate	Checked file if mediator's invoice was paid; internal communication regarding payment of invoice.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
7/31/24	0.5	Draft document (other)	Draft letter motion requesting extension to complete discovery.	\$ 195.00	\$ 97.50	Lucy Espinal	Paralegal
7/31/24	0.5	Research	MCA memo research	\$ 195.00	\$ 97.50	Will Castelli	Law Clerk
8/1/24	0.3	Process Electronic Court Documents	Process in Court Order scheduling phone conference for tomorrow.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
8/1/24	0.4	Draft document (other)	Draft court appearance form for tomorrow.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
8/1/24	0.3	Calendar & Task Out All Deadlines/ Appearances/ Dates From Scheduling Order/CMO/TMO	Calendar and task tomorrow's hearing; block time for attorney to prepare this afternoon.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
8/1/24	0.5		Review Shkolir mileage CDOX, analyze use, task team to bates + produce	\$ 450.00	\$ 225.00	Penn Dodson	Partner
8/1/24	1.2	Analysis/ Substantive Review	Further analysis of mileage records, comparing to Ds trip logs	\$ 450.00	\$ 540.00	Penn Dodson	Partner
8/2/24	0.6		Shkolir: Conference re Disc Ltr Mtn, Sched Sett Confy Coll Cert (Phone)	\$ 450.00	\$ 270.00	Penn Dodson	Partner
8/2/24	0.1	Communicate	slack from Penn re today's phone meeting	\$ 195.00	\$ 19.50	Will Castelli	Law Clerk
8/2/24	0.6	Telephone/Video Meeting	Court conference w Penn and OC re discovery issues, meet and confer	\$ 195.00	\$ 117.00	Will Castelli	Law Clerk
8/2/24	0.1	Communicate	slacking penn re notes from teleconference	\$ 195.00	\$ 19.50	Will Castelli	Law Clerk
8/6/24	0.2	Read/review incoming email or correspondence	JV rrvw'd docket and corr generally	\$ 195.00	\$ 39.00	Jess Velez	Paralegal
8/6/24	0.5	Telephone/Video Meeting	meet and confer with PD and OC	\$ 195.00	\$ 97.50	Will Castelli	Law Clerk
8/6/24	0.1	Read/review incoming email or correspondence	reading PD's email to OC	\$ 195.00	\$ 19.50	Will Castelli	Law Clerk
8/8/24	0.5	Process Electronic Court Documents	Process in filed Motion to Withdraw Stipulation to Collective Cert, Order granting motion and Court Order regarding result of phone conference.	\$ 195.00	\$ 97.50	Lucy Espinal	Paralegal
8/8/24	0.3	Calendar & Task Out All Deadlines/ Appearances/ Dates From Scheduling Order/CMO/TMO	Calendar and task the status report, the next meet and confer pm 8/20.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
8/8/24	0.3	Read/review incoming email or correspondence	Read internal communications regarding conference held on 8/2, and attorney's recap email of the meet and conferral on 8/6.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
8/8/24	0.5	Draft document (other)	Draft joint status report regarding result of meet and confer and proposing another status report due by 8/27/24.	\$ 195.00	\$ 97.50	Lucy Espinal	Paralegal
8/13/24	0.2	Compose/Send Email	Follow up email to opposing counsel regarding status report due today.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
8/13/24	0.3	Process Documents	Process in opposing counsel's edits to joint status report due today.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
8/13/24	0.3	File Document with Courts	Finalize and file Joint Status Report.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
8/13/24	0.3	Process Electronic Court Documents	Process in filed Joint Status Report; task to follow up on request for next status report.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
8/13/24	5.3	Research	researching cases for the MCA memo; mostly small vehicle exception stuff	\$ 195.00	\$ 1,033.50	Will Castelli	Law Clerk

Date	Hours	Activity category	Description	Rate (\$)	Billable (\$)	User	Role
8/13/24	0.2	Communicate	slack w penn re MCA and TCA, small vehicle exception to exemption	\$ 195.00	\$ 39.00	Will Castelli	Law Clerk
8/14/24	0.4	Draft document (other)	Letter motion to judge requesting extension of time for deadlines.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
8/14/24	0.1	Manage/Delegate/Assign	Task and assign letter motion to judge requesting extension of time for deadlines.	\$ 195.00	\$ 19.50	Lucy Espinal	Paralegal
8/14/24	0.3	Process Electronic Court Documents	Process in court order regarding joint status report due 8/27/24.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
8/14/24	0.3	Calendar & Task Out All Deadlines/ Appearances/ Dates From Scheduling Order/CMO/TMO	Calendar and task Order on joint status report due 8/27/24.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
8/14/24	0.2	Compose/Send Email	Review drafted judge ltr req ext of disc/modify deadlines; EM to OC	\$ 450.00	\$ 90.00	Penn Dodson	Partner
8/14/24	1.2	Edit Document	Revise amended cplt + EM to OC	\$ 450.00	\$ 540.00	Penn Dodson	Partner
8/14/24	0.7	Research	more case digging before typing up the memo	\$ 195.00	\$ 136.50	Will Castelli	Law Clerk
8/15/24	0.2		edit ltr requesting ext of time for discovery	\$ 450.00	\$ 90.00	Penn Dodson	Partner
8/15/24	1.7	Research	finalizing cases and such for MCA memo	\$ 195.00	\$ 331.50	Will Castelli	Law Clerk
8/15/24	2.4	Draft document (other)	research and drafting MCA memo	\$ 195.00	\$ 468.00	Will Castelli	Law Clerk
8/16/24	0.2	Compose/Send Email	Follow up email to opposing counsel regarding letter motion sent to him for review and approval.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
8/16/24	0.4	Process Documents	Receipt and review of email from opposing counsel; process in Defendant's Declaration and D1425 produced; assign attorney to review and Slack to attorney.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
8/16/24	0.2	Read/review incoming email or correspondence	Receipt and review of email from opposing counsel with comments on motion for extension of deadlines; Slack information to attorney	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
8/16/24	3	Draft document (other)	finishing (!) the MCA memo	\$ 195.00	\$ 585.00	Will Castelli	Law Clerk
8/16/24	4.1	Edit Document	finishing MCA memo	\$ 195.00	\$ 799.50	Will Castelli	Law Clerk
8/16/24	0.1	Communicate	Slacking Penn re MCA memo	\$ 195.00	\$ 19.50	Will Castelli	Law Clerk
8/19/24	0.1	Communicate	slack w penn re MCA memo	\$ 195.00	\$ 19.50	Will Castelli	Law Clerk
8/20/24	0.3	Draft document (other)	Set up joint status report.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
8/20/24	0.3	Compose/Send Email	Email to opposing counsel with revised letter to court with revisions highlighted.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
8/20/24	1		Zoom Conferall with OC then afterward work on speradsheet to give to him w examples of underpayments	\$ 450.00	\$ 450.00	Penn Dodson	Partner
8/20/24	0.3	Telephone/Video Meeting	meet and confer with OC and PD	\$ 195.00	\$ 58.50	Will Castelli	Law Clerk
8/23/24	1.2	Compose/Send Email	build out + EM OC spreadsheet of examples of underpayments	\$ 450.00	\$ 540.00	Penn Dodson	Partner
8/26/24	0.1	Read/review incoming email or correspondence	Read email from Penn to opposing counsel with spreadsheet on Plaintiffs payment records.	\$ 195.00	\$ 19.50	Lucy Espinal	Paralegal
8/26/24	0.3	Compose/Send Email	Follow up email to opposing counsel regarding deadlines extension letter request to court; communicate to Penn regarding no response from opposing counsel.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
8/26/24	0.4	Compose/Send Email	Edit status report lucy set up + EM to OC	\$ 450.00	\$ 180.00	Penn Dodson	Partner
8/27/24	0.2	Read/review incoming email or correspondence	Read email from attorney to opposing counsel on letter extension for deadlines and internal communication regarding same.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
8/27/24	0.5	Process Documents	Process in joint status letter from opposing counsel with his edits; receipt and review of emails from opposing counsel regarding same and on letter for extension; pull previous case management plan; Slack to attorney.	\$ 195.00	\$ 97.50	Lucy Espinal	Paralegal
8/27/24	0.4	File Document with Courts	Finalize Joint Status Report, create pdf exhibit of declaration and attachment; file with the court.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
8/27/24	0.4	Process Electronic Court Documents	Process in filed joint Status Report and exhibit; task to follow up for judge issuing another status report.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
8/28/24	0.4	Process Electronic Court Documents	Process in filed letter motion requesting extension of deadlines, task to follow through on court granting request.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
8/28/24	0.5	Draft document (other)	Set up 2nd Request for Production of Documents to Defendants.	\$ 195.00	\$ 97.50	Lucy Espinal	Paralegal
8/28/24	0.5	Edit Document	Review and edit First Interrogatories to Defendants.	\$ 195.00	\$ 97.50	Lucy Espinal	Paralegal
8/29/24	0.3	Process Electronic Court Documents	Process in court order on letter motion filed requesting extension for deadlines.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
8/29/24	0.5	Calendar & Task Out All Deadlines/ Appearances/ Dates From Scheduling Order/CMO/TMO	Task out and calendar deadlines in court order.	\$ 195.00	\$ 97.50	Lucy Espinal	Paralegal
9/3/24	0.5	Draft document (other)	Draft joint status report; task attorney to edit.	\$ 195.00	\$ 97.50	Lucy Espinal	Paralegal
9/5/24	0.2	Read/review incoming email or correspondence	Read emails between counsel regarding joint status report on motion to amend complaint.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
9/6/24	0.7	Process Electronic Court Documents	Process in filed status report and attachments and Court Orders on 2d amended complaint briefing schedule and extension of discovery deadlines.	\$ 195.00	\$ 136.50	Lucy Espinal	Paralegal
9/9/24	0.8	Calendar & Task Out All Deadlines/ Appearances/ Dates From Scheduling Order/CMO/TMO	Calendar and task out briefing schedule on Motion to Amend the Amended Complaint; update calendar and tasks from Court Order granting extension of deadlines.	\$ 195.00	\$ 156.00	Lucy Espinal	Paralegal
9/13/24	0.3	Process Electronic Court Documents	Process in Court Order referring motion to amend to MJ Kuo.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
9/17/24	0.1	Communicate	Internal communication regarding status of case.	\$ 195.00	\$ 19.50	Lucy Espinal	Paralegal
9/23/24	0.2	Prep Attorney for PNC Meeting	Scheduled PNC Espinal with meeting with attorney for 09/26. Emailed request for CDOX.	\$ 125.00	\$ 25.00	Brissa Chavez	Client Relations Specialist
9/23/24	0.2	L140 Document/File Management	Check docket for any filing by defendants which was due by Friday; Slack to attorney regarding defendants did not file an opposition to plaintiffs' motion to amend the amended complaint.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
9/23/24	0.3	Telephone/Video Meeting	Telephone call with Isaac Espinal regarding his working at RX2GO; took information; Slacked information to Penn and Brissa for an intake call.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
9/25/24	0.4	Draft document (other)	Draft letter motion to Court regarding our Motion to Amend the Amended Complaint be granted as Defendants did not file an opposition to it.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
9/26/24	0.5	Draft document (other)	Set up Plaintiffs' Request for Admissions to Defendants and certificate of service.	\$ 195.00	\$ 97.50	Lucy Espinal	Paralegal
9/26/24	0.4	Edit Document	Edits/update captions on Plaintiffs' Interrogatories and Plaintiffs' Request for Production of Documents to Defendants and certificates of service.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
9/27/24	0.3	Edit Document	Edits to discovery requests.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal

Date	Hours	Activity category	Description	Rate (\$)	Billable (\$)	User	Role
9/27/24	0.3	File Document with Courts	Finalize and file letter in support of Plaintiffs' motion to amend the amended complaint.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
9/27/24	0.3	Process Electronic Court Documents	Process in filed letter to Judge requesting approval of motion to amend complaint.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
9/27/24	0.3	Process Electronic Court Documents	Process in Court Order granting Plaintiffs Motion to File 2nd Amended Complaint.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
9/27/24	0.1	Calendar & Task Out All Deadlines/ Appearances/ Dates From Scheduling Order/CMO/TMO	Calendar and task deadline to file Plaintiffs Motion to File 2nd Amended Complaint.	\$ 195.00	\$ 19.50	Lucy Espinal	Paralegal
9/30/24	0.2	Edit Document	Edit/Propound via email y letterstream disc requests to OC	\$ 150.00	\$ 30.00	Callyn Carter	Paralegal
9/30/24	0.3	Draft document (other)	Letter to opposing counsel enclosing discovery requests.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
9/30/24	0.3	Edit Document	Finalize and date discovery requests and certificates of service; task Callyn to send via mail and email.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
9/30/24	0.1	Calendar & Task Out All Deadlines/ Appearances/ Dates From Scheduling Order/CMO/TMO	Calendar and task out due date for Defendants' responses to our discovery requests.	\$ 195.00	\$ 19.50	Lucy Espinal	Paralegal
10/1/24	0.4	Draft document (other)	Draft proposed summons on Victoria NYC I, Inc.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
10/1/24	0.3	Process Electronic Court Documents	Process in Defendants' motion for extension to file response to Plaintiffs' Motion to Amend the Amended Complaint; task to follow up on ruling.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
10/1/24	0.3	Process Electronic Court Documents	Process in Order denying Defendants' motion for extension to file response.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
10/1/24	0.4	File Document with Courts	File Second Amended Complaint and proposed Summons on additional Defendant.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
10/2/24	0.4	Process Electronic Court Documents	Process in filed Amended Complaint and proposed Summons.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
10/2/24	0.4	Calendar & Task Out All Deadlines/ Appearances/ Dates From Scheduling Order/CMO/TMO	Calendar and task deadlines for serving Amended Complaint on additional Defendant and deadline for existing Defendants to answer; update assign additional tasks in Asana.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
10/3/24	0.2	Read/review incoming email or correspondence	Email clients copy of the 2nd amended complaint	\$ 150.00	\$ 30.00	Callyn Carter	Paralegal
10/3/24	0.3	Process Electronic Court Documents	Process in summons issued for additional Defendant; task attorney to determine service; task to follow up.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
10/3/24	0.1	Compose/Send Email	EM OC re accepting svc of New Amended Complaint	\$ 450.00	\$ 45.00	Penn Dodson	Partner
10/7/24	0.4	Draft document (other)	Draft Stipulation to Answer Date.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
10/8/24	0.3	Compose/Send Email	Email to opposing counsel with Stipulation to Answer Date for his review and approval.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
10/9/24	0.2	Read/review incoming email or correspondence	Follow up email to opposing counsel for his consent to the Stipulation to Answer Date.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
10/14/24	0.4	Process Documents	Receipt and review of email from opposing counsel; process in his letter requesting extension to answer complaint; proofread and Slack letter to attorney and task to review and respond.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
10/14/24	0.3	Compose/Send Email	Email to opposing counsel advising him Penn approves his motion with spelling corrections made.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
10/14/24	0.2		review OC's letter to judge re date to answer complaint	\$ 450.00	\$ 90.00	Penn Dodson	Partner
10/15/24	0.1	Communicate	Internal communication regarding opposing counsel's filing for his extension to respond to complaint; and scheduling depositions.	\$ 195.00	\$ 19.50	Lucy Espinal	Paralegal
10/16/24	0.2	Read/review incoming email or correspondence	Emails from opposing counsel on consent to extension to answer; check Amended Complaint for spelling of Plaintiff Badmaev's name	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
10/16/24	0.3	Process Electronic Court Documents	Process in Defendants' letter motion for extension of time to answer second amended complaint.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
10/16/24	0.2	Telephone/Video Meeting	Telephone call with Plaintiff Badmaev regarding spelling of his name and status of case.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
10/16/24	0.3	Process Electronic Court Documents	Process in Order granting Defendants' motion for extension to answer second amended complaint.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
10/16/24	0.2	Calendar & Task Out All Deadlines/ Appearances/ Dates From Scheduling Order/CMO/TMO	Update calendar and task for Defendants' deadline to answer second amended complaint.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
10/23/24	0.2	Read/review incoming email or correspondence	Read email from Penn to opposing counsel regarding possible discovery extension request; task to follow up for response.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
10/30/24	0.5	Draft document (other)	Draft letter motion for extension of time for discovery; task out remaining tasks.	\$ 195.00	\$ 97.50	Lucy Espinal	Paralegal
10/30/24	0.2	Read/review incoming email or correspondence	Email from opposing counsel consenting to motion for extension of time for discovery; Slack to attorney.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
10/30/24	0.2	Compose/Send Email	Revise ltr motn to extend deadlines & EM to OC	\$ 450.00	\$ 90.00	Penn Dodson	Partner
10/31/24	0.3	File Document with Courts	Finalize and file letter motion requesting extension of time on deadlines; task to follow up if granted.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
10/31/24	0.4	Process Electronic Court Documents	Process in filed letter motion and Order approving; tasked to update new deadline tasks.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
11/4/24	0.5	Calendar & Task Out All Deadlines/ Appearances/ Dates From Scheduling Order/CMO/TMO	Update calendar and tasks for new deadlines approved by the Court and subtasks associated with them.	\$ 195.00	\$ 97.50	Lucy Espinal	Paralegal
11/6/24	0.3	Compose/Send Email	Email to opposing counsel regarding their overdue discovery responses.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
11/12/24	0.1	Communicate	Internal communication regarding status of case and overdue discovery responses.	\$ 195.00	\$ 19.50	Lucy Espinal	Paralegal
11/13/24	0.4	Draft document (other)	Draft meet and confer letter regarding defendants' overdue discovery responses to opposing counsel.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
11/14/24	0.4	Compose/Send Email	Email to opposing counsel with meet and confer letter regarding their overdue discovery responses; task to follow up.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
11/15/24	0.3	Process Electronic Court Documents	Process in Defendants' letter motion for pre-motion conference on motion to dismiss.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
11/15/24	0.3	Calendar & Task Out All Deadlines/ Appearances/ Dates From Scheduling Order/CMO/TMO	Calendar and task out Plaintiffs' response to Defendants' letter motion for pre-motion conference on motion to dismiss.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal

Date	Hours	Activity category	Description	Rate (\$)	Billable (\$)	User	Role
11/15/24	0.2	Research	Review judge's individual rules on responsive motions for Plaintiffs' response to Defendants' letter motion for premotion conference on motion to dismiss.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
11/15/24	0.4	Draft document (other)	Set up Plaintiffs' response to Defendants' letter motion for premotion conference on motion to dismiss.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
11/20/24	0.3	Process Electronic Court Documents	Process in court order scheduling premotion conference on 12/11.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
11/20/24	0.4	Calendar & Task Out All Deadlines/ Appearances/ Dates From Scheduling Order/CMO/TMO	Calendar and task out premotion conference; block travel time for both attorneys.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
11/21/24	0.4	Draft document (other)	Draft court appearance form for 12/11/24 pre-motion conference.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
11/21/24	0.1	Manage/Delegate/Assign	Assign and block time for attorney to prep for pre-motion conference.	\$ 195.00	\$ 19.50	Lucy Espinal	Paralegal
11/22/24	0.2	Manage/Delegate/Assign	Check for response on our meet and confer letter; task to follow up on next steps.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
11/22/24	0.4	Telephone/Video Meeting	Telephone call with Ellie Shkolir regarding status of case and upcoming premotion conference.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
12/10/24	0.4	Process Electronic Court Documents	Process in Court's Text Orders cancelling tomorrow's conference and assigning Judge Kuo to pre-motion filing.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
12/10/24	0.2	Calendar & Task Out All Deadlines/ Appearances/ Dates From Scheduling Order/CMO/TMO	Delete tomorrow's hearing and update Asana	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
12/10/24	0.8		Prep for court appearance - review file, review the most recent/relevant submissions, review/edit court appearance form	\$ 450.00	\$ 360.00	Penn Dodson	Partner
12/11/24	0.3	Process Electronic Court Documents	Process in Order scheduling pre-motion hearing for 12/17.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
12/11/24	0.4	Calendar & Task Out All Deadlines/ Appearances/ Dates From Scheduling Order/CMO/TMO	Calendar and task new conference date; update court appearance form with new date/time.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
12/12/24	0.1	Read/review incoming email or correspondence	Read emails between attorneys regarding rescheduling confernece.	\$ 195.00	\$ 19.50	Lucy Espinal	Paralegal
12/12/24	0.4	Process Electronic Court Documents	Process in Defendants' consent motion to reschedule conference and Order granting the motion.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
12/12/24	0.4	Calendar & Task Out All Deadlines/ Appearances/ Dates From Scheduling Order/CMO/TMO	Update calendar and tasks to new conference date; update court appearance form; block travel time for attorneys.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
12/12/24	0.2	Read/review incoming email or correspondence	Read emails between attorneys regarding converting or rescheduling pre-motion conference; internal communication regarding same.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
12/12/24	0.5	Draft document (other)	Research judge's individual rules on adjournments; draft motion to convert to phone conference or adjourn.	\$ 195.00	\$ 97.50	Lucy Espinal	Paralegal
12/12/24	0.3	File Document with Courts	File letter motion to convert pre-motion conference to phone or adjourn.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
12/12/24	0.2	Communicate	slack w PD re notes from mediation	\$ 195.00	\$ 39.00	Will Castelli	Law Clerk
12/13/24	0.4	Process Electronic Court Documents	Process in filed motion to convert conference to phone and Order granting the motion.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
12/13/24	0.3	Calendar & Task Out All Deadlines/ Appearances/ Dates From Scheduling Order/CMO/TMO	Update calendar and Asana from Order converting the conference to phone; unblock travel time on attorneys' calendar.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
12/13/24	0.2	Edit Document	Edit court appearance form with Order converting the conference to phone.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
12/13/24	0.1	Read/review incoming email or correspondence	Read email from attorney to opposing counsel regarding possible settlement discussions.	\$ 195.00	\$ 19.50	Lucy Espinal	Paralegal
12/19/24	0.4	Telephone/Video Meeting	Telephone call with Ellie regarding status of case, upcoming pre-motion hearing and recent filings.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
1/3/25	0.4	Calendar & Task Out All Deadlines/ Appearances/ Dates From Scheduling Order/CMO/TMO	Calendar and task Plaintiffs' letter motion to amend complaint by 1/24 and Defendants to respond by 1/31.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
1/3/25	0.3	Process Electronic Court Documents	Process in Order re Plaintiffs to file letter motion to amend complaint by 1/24 and Defendants to respond by 1/31.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
1/3/25	0.7	Draft document (other)	Set up third amended complaint redlined; Slack to attorney.	\$ 195.00	\$ 136.50	Lucy Espinal	Paralegal
1/3/25	0.5	Draft document (other)	Draft letter motion to amend second amended complaint; task attorney to edit.	\$ 195.00	\$ 97.50	Lucy Espinal	Paralegal
1/3/25	2.4		Work on revisions to cplt (involving a good bit of math) while issues fresh on my mind after court	\$ 450.00	\$ 1,080.00	Penn Dodson	Partner
1/3/25	0.8		Court Appearance Re: Pre-Motion Conf (Phone) re Ds prp MTD	\$ 450.00	\$ 360.00	Penn Dodson	Partner
1/3/25	0.7	Document Review	background reading to prep for hearing	\$ 195.00	\$ 136.50	Will Castelli	Law Clerk
1/3/25	0.7	Appear for/attend	pre-motion conference with mag. judge	\$ 195.00	\$ 136.50	Will Castelli	Law Clerk
1/7/25	0.1	Communicate	Internal communication regarding status of case.	\$ 195.00	\$ 19.50	Lucy Espinal	Paralegal
1/9/25	0.1	L300 Discovery	Checked status of subpoena drafted to Chase Bank.	\$ 195.00	\$ 19.50	Lucy Espinal	Paralegal
1/14/25	0.3	Telephone/Video Meeting	Telephone call with Ellie regarding status update on case.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
1/21/25	0.2	Read/review incoming email or correspondence	Read email from attorney to Ellie; text message to Ellie letting him know to check his email.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
1/22/25	0.4	Book appointment/ schedule meeting (incl. reserving space etc. if applicable)	Telephone call with Ellie Shkolir; scheduled Zoom with attorney to discuss settlement offer.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
1/22/25	0.5	Draft document (other)	Draft letter motion for extension to file Motion to Amend Complaint.	\$ 195.00	\$ 97.50	Lucy Espinal	Paralegal
1/22/25	0.3	File Document with Courts	File letter motion to request extension of time to file motion to amend complaint.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
1/22/25	0.3	Process Electronic Court Documents	Process in filed letter motion requesting extension; task to follow up if granted.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
1/22/25	0.3	Process Electronic Court Documents	Process in Order granting letter motion requesting extension.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
1/22/25	0.2	Calendar & Task Out All Deadlines/ Appearances/ Dates From Scheduling Order/CMO/TMO	Calendar and task out the updated due dates from the Order granting letter motion requesting extension.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
1/23/25	0.5		Shkolir - Zoom with Ellie Shkolir	\$ 475.00	\$ 237.50	Penn Dodson	Partner
2/10/25	0.3	Compose/Send Email	Em's back & forth w OC re sett offers	\$ 475.00	\$ 142.50	Penn Dodson	Partner
2/13/25	0.5	Draft document (other)	Draft letter motion to extend time to file motion for leave to amend complaint.	\$ 195.00	\$ 97.50	Lucy Espinal	Paralegal

Date	Hours	Activity category	Description	Rate (\$)	Billable (\$)	User	Role
2/13/25	0.5	File Document with Courts	Finalize, file and process in motion for extension to file motion to to file amended complaint.	\$ 195.00	\$ 97.50	Lucy Espinal	Paralegal
2/13/25	0.3	Process Electronic Court Documents	Process in Order granting motion for extension of time.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
2/13/25	0.2	Calendar & Task Out All Deadlines/ Appearances/ Dates From Scheduling Order/CMO/TMO	Update calendar and Asana with new dates from Order granting motion for extension of time.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
2/19/25	0.5	Draft document (other)	Draft letter motion for extension of time for discovery; link previous request with old dates; task out in Asana; Slack to attorney re same.	\$ 195.00	\$ 97.50	Lucy Espinal	Paralegal
2/21/25	0.2	Read/review incoming email or correspondence	Receipt and review of emails between attorneys on settlement offers and consent on motion for extension of time of deadlines.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
2/21/25	0.3	File Document with Courts	Finalize and file joint letter motion requesting extension of time for deadlines.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
2/21/25	0.3	Process Electronic Court Documents	Process in filed motion for extension of time for deadlines; task to follow up on approval.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
2/21/25	0.3	Process Electronic Court Documents	Process in Order granting motion for extension of deadlines.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
2/21/25	0.4	Compose/Send Email	edit motn to extend deadlines + EM OC that + settl move	\$ 475.00	\$ 190.00	Penn Dodson	Partner
2/24/25	0.5	Calendar & Task Out All Deadlines/ Appearances/ Dates From Scheduling Order/CMO/TMO	Updated calendar and tasks from extension of discovery deadlines and extension to file motion to amend complaint.	\$ 195.00	\$ 97.50	Lucy Espinal	Paralegal
2/26/25	0.1	Read/review incoming email or correspondence	Receipt and review of emails between attorneys regarding settlement offers.	\$ 195.00	\$ 19.50	Lucy Espinal	Paralegal
2/28/25	0.3	Process Electronic Court Documents	Process in Order scheduling settlement conference and status report due 4/7/25.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
2/28/25	0.5	Calendar & Task Out All Deadlines/ Appearances/ Dates From Scheduling Order/CMO/TMO	Calendar and taskout settlement conference on 4/30, exchange of demands, ex parte statement and status report due 4/7 with subtasks.	\$ 195.00	\$ 97.50	Lucy Espinal	Paralegal
2/28/25	0.3	Compose/Send Email	EMs back & forth w OC exchanging offers	\$ 475.00	\$ 142.50	Penn Dodson	Partner
3/7/25	1.5	Draft document (other)	Letter to each client with information on settlement conference on 4/30/25 and what to expect; email to each client with copy of the letter and link to video on what to expect at a settlement conference; text to each letting them know to check their email for the letter and information.	\$ 195.00	\$ 292.50	Lucy Espinal	Paralegal
3/7/25	0.3	Pay Costs/ Update Expense Sheet and Clio	Sent letters to clients via Letterstream; add postage to Clio.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
3/7/25	0.3	Telephone/Video Meeting	Telephone calls to clients regarding date and time of settlement conference and need for interpreter and/or if client will translate.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
3/7/25	1		Set up ex parte settlement statement, gather possible exhibits, pull email with latest settlement offers, set up settlement agreement term sheet.	\$ 195.00	\$ 195.00	Lucy Espinal	Paralegal
3/10/25	0.4	Draft document (other)	Draft court appearance form for settlement conference; block attorney time to edit.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
3/10/25	0.1	Compose/Send Email	ping OC re settl move	\$ 475.00	\$ 47.50	Penn Dodson	Partner
3/14/25	0.2		consider OCs offer, counter it	\$ 475.00	\$ 95.00	Penn Dodson	Partner
3/17/25	0.5	Draft document (other)	Draft letter motion for extension of time to file 3rd amended complaint; task attorney to edit; Slack to attorney.	\$ 195.00	\$ 97.50	Lucy Espinal	Paralegal
3/18/25	0.7	File Document with Courts	Finalize and file motion for extension of time to file motion to amend complaint; process in filed motion; process in Order granting motion.	\$ 195.00	\$ 136.50	Lucy Espinal	Paralegal
3/18/25	0.1	Calendar & Task Out All Deadlines/ Appearances/ Dates From Scheduling Order/CMO/TMO	Update calendar and tasks/subtasks with new dates from Order granting motion for extension of time to file motion to amend complaint.	\$ 195.00	\$ 19.50	Lucy Espinal	Paralegal
3/18/25	0.3	Compose/Send Email	Edit motn to extend deadlines til after settl conf, EM OC	\$ 475.00	\$ 142.50	Penn Dodson	Partner
3/18/25	0.3	Attorney Strat Planning or Discussion	Confer w CTA re settl moves in effort to speed things up	\$ 475.00	\$ 142.50	Penn Dodson	Partner
3/25/25	0.2	Edit Document	Edits ex parte statement; Slack to attorney.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
3/25/25	0.1	Compose/Send Email	ping OC for resp to our most recent offer	\$ 475.00	\$ 47.50	Penn Dodson	Partner
3/26/25	0.5	Draft document (other)	Review court order regarding join status report due; set up joint status report; task attorney to edit; Slack to attorney.	\$ 195.00	\$ 97.50	Lucy Espinal	Paralegal
3/27/25	0.3	Attorney Strat Planning or Discussion	Planning logistics re 4/30 settl conf	\$ 475.00	\$ 142.50	Penn Dodson	Partner
4/1/25	0.1	Communicate	Internal communication regarding status report due Monday.	\$ 195.00	\$ 19.50	Lucy Espinal	Paralegal
4/1/25	0.1	Internal Meeting	Internal meeting discussing upcoming settlement conference and status report due next week.	\$ 195.00	\$ 19.50	Lucy Espinal	Paralegal
4/7/25	0.5	File Document with Courts	Receipt and review of emails between attorneys discussing joint status report; finalize and file joint status report; process in filed document.	\$ 195.00	\$ 97.50	Lucy Espinal	Paralegal
4/15/25	1		(due 4/21) Work on Ex Parte Statement	\$ 475.00	\$ 475.00	Penn Dodson	Partner
4/15/25	2.3	Edit Document	ex parte stmt	\$ 475.00	\$ 1,092.50	Penn Dodson	Partner
4/16/25	0.3	Edit Document	ex parte stmt final review	\$ 475.00	\$ 142.50	Penn Dodson	Partner
4/17/25	0.4	Compose/Send Email	Email to clients reminding them of settlement conference on 4/30; receipt and review of email from Evgenii confirming receipt.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
4/21/25	0.4	Compose/Send Email	Finalize and email ex parte settlement statement to judge.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
4/22/25	0.1	Read/review incoming email or correspondence	Receipt and review of email scheduling pre-settlement conference call with judge.	\$ 195.00	\$ 19.50	Lucy Espinal	Paralegal
4/22/25	0.1	Read/review incoming email or correspondence	Receipt and review of email from opposing counsel regarding settlement conference and settlement discussions.	\$ 195.00	\$ 19.50	Lucy Espinal	Paralegal
4/23/25	0.1	Read/review incoming email or correspondence	Receipt and review of emails between attorneys regarding Monday's settlement conference and settlement proposals.	\$ 195.00	\$ 19.50	Lucy Espinal	Paralegal
4/24/25	0.4	Telephone/Video Meeting	Telephone calls to Plaintiffs reminding them of next week's settlement conference.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
4/24/25	0.4	Send/Receive Texts	Text messages to/from plaintiffs to arrive earlier to meet with Penn before the conference; internal communication regarding same.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
4/24/25	1		Shkolir: Hold poss call w/Judge ex parte re settl conf	\$ 475.00	\$ 475.00	Penn Dodson	Partner
4/28/25	0.5	Telephone/Video Meeting	Telephone calls with plaintiffs and email and text messages to/from plaintiffs regarding settlement conference on Wednesday.	\$ 195.00	\$ 97.50	Lucy Espinal	Paralegal

Date	Hours	Activity category	Description	Rate (\$)	Billable (\$)	User	Role
4/29/25	0.4	Telephone/Video Meeting	Telephone calls with Ellie and Evgenii regarding tomorrow's settlement conference.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
4/29/25	0.3	Telephone/Video Meeting	Telephone call from Ellie regarding RX2GO and meeting with Penn before settlement conference tomorrow.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
4/30/25	2	Travel	local travel to/from court for settl conference	\$ 200.00	\$ 400.00	Penn Dodson	Partner
4/30/25	0.8		meet w clients at court	\$ 475.00	\$ 380.00	Penn Dodson	Partner
4/30/25	2.8	L160 Settlement/Non-Binding ADR	setl conf w MJ Kuo in person	\$ 475.00	\$ 1,330.00	Penn Dodson	Partner
4/30/25	0.8	Draft document (other)	setl agr	\$ 475.00	\$ 380.00	Penn Dodson	Partner
5/1/25	0.4	Process Electronic Court Documents	Process in Minute Order regarding yesterday's settlement agreement; review of settlement agreement Penn sent to opposing counsel.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
5/1/25	0.2	Calendar & Task Out All Deadlines/ Appearances/ Dates From Scheduling Order/CMO/TMO	Calendar and task out Order on Motion for Approval of Settlement Agreement.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
5/1/25	0.4	Assemble / gather / collect documents together	Gather exhibits for the motion to approve settlement agreement and declaration.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
5/1/25	1.5	Draft document (other)	Begin drafting Attorney Declaration for Motion to Approve Settlement Agreement; review file, docket, emails.	\$ 195.00	\$ 292.50	Lucy Espinal	Paralegal
5/2/25	0.4	Compose/Send Email	Email to/from opposing counsel on status of the drafted settlement agreement sent to him; task to follow up next week.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
5/2/25	0.8	Draft document (other)	Finish drafting attorney declaration with work performed, chronology of docket and court appearances.	\$ 195.00	\$ 156.00	Lucy Espinal	Paralegal
5/2/25	0.4	Edit Document	review atty dec re motn to approve/fees	\$ 475.00	\$ 190.00	Penn Dodson	Partner
5/6/25	0.3	Process Documents	Receipt and review of email from opposing counsel; process in his redlined settlement agreement; Slack to attorney.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
5/13/25	0.1	Communicate	Internal communication regarding status of case, settlement agreement and upcoming deadline on the motion to amend complaint.	\$ 195.00	\$ 19.50	Lucy Espinal	Paralegal
5/23/25	0.4	Send/Receive Texts	Text message from/to Ellie regarding settlement and payment.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
5/28/25	0.1	Read/review incoming email or correspondence	Read email from attorney to opposing counsel regarding changes to settlement agreement; task to follow up.	\$ 195.00	\$ 19.50	Lucy Espinal	Paralegal
5/28/25	0.6	Edit Document	Review OC's revisions to settl agr, make further revisions & EM him	\$ 475.00	\$ 285.00	Penn Dodson	Partner
5/29/25	0.5	Draft document (other)	Draft letter motion for extension of time to file motion for approval of settlement agreement; task out editing and filing; Slack to attorney.	\$ 195.00	\$ 97.50	Lucy Espinal	Paralegal
5/29/25	0.3	Compose/Send Email	Email to opposing counsel following up on settlement agreement and requesting an extension of time.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
5/30/25	0.2	Read/review incoming email or correspondence	Email from opposing counsel regarding settlement agreement and consenting to requesting extension of time to file motion for approval; Slack to attorney.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
5/30/25	0.5	File Document with Courts	Update letter motion, file with court, and process in filed motion; task to follow up on approval.	\$ 195.00	\$ 97.50	Lucy Espinal	Paralegal
6/2/25	0.4	Send/Receive Texts	Text messages from/to Ellie regarding settlement agreement.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
6/2/25	0.3	Process Electronic Court Documents	Process in Order granting motion for extension to file Motion to Approve Settlement Agreement; update tasks.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
6/2/25	0.3	Compose/Send Email	Email to opposing counsel regarding Settlement Agreement, extension to Friday, and getting signatures.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
6/2/25	0.3	Process Documents	Process in another redlined version of the settlement agreement from opposing counsel; Slack to attorney.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
6/5/25	0.4	Edit Document	review SA edits, EM OC	\$ 475.00	\$ 190.00	Penn Dodson	Partner
6/6/25	0.5	Draft document (other)	Set up letter motion for extension of time and to request telephone conference; task attorney to edit; Slack to attorney; internal communication regarding filing of letter.	\$ 195.00	\$ 97.50	Lucy Espinal	Paralegal
6/6/25	0.3	Compose/Send Email	Email to/from opposing counsel regarding letter motion for extension of time and to request telephone conference.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
6/6/25	0.1	Communicate	Internal communication regarding extension of time to file motion to approve the settlement agreement.	\$ 195.00	\$ 19.50	Lucy Espinal	Paralegal
6/6/25	0.2	Edit Document	edit judge ltr - got filed at 11:58pm ET	\$ 475.00	\$ 95.00	Penn Dodson	Partner
6/9/25	0.3	Process Electronic Court Documents	Process in filed second letter motion for extension of time to file Motion to Approve Settlement Agreement; task to follow up on approval.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
6/10/25	0.1	Read/review incoming email or correspondence	Receipt and review of email from opposing counsel regarding settlement agreement; Slack to attorney.	\$ 195.00	\$ 19.50	Lucy Espinal	Paralegal
6/11/25	0.2	Telephone/Video Meeting	Telephone call from Rashad Williams regarding status of settlement agreement and payment.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
6/11/25	1	Draft document (other)	Draft letters to each client on what to expect with possible settlement; emails to each client with copy of letter; send letters to each client by LetterStream; pay postage; add cost to Clio.	\$ 195.00	\$ 195.00	Lucy Espinal	Paralegal
6/18/25	0.1	Communicate	Check status of settlement agreement and upcoming deadline; internal communication regarding same.	\$ 195.00	\$ 19.50	Lucy Espinal	Paralegal
6/18/25	0.5	Draft document (other)	Set up letter motion to request phone conference; receipt and review of emails between attorneys regarding settlement agreement and request for phone conference; internal communication regarding same.	\$ 195.00	\$ 97.50	Lucy Espinal	Paralegal
6/18/25	0.4	Edit Document	EM OC re SA status, edit ltr to court req phone conf & ECF file	\$ 475.00	\$ 190.00	Penn Dodson	Partner
6/19/25	0.3	Process Electronic Court Documents	Process in filed Letter Motion to Request Phone Conference.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
6/23/25	0.3	Process Electronic Court Documents	Process in Order scheduling phone conference on the settlement agreement for 7/7/25.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
6/23/25	0.4	Calendar & Task Out All Deadlines/ Appearances/ Dates From Scheduling Order/CMO/TMO	Calendar and task out Order scheduling phone conference on the settlement agreement for 7/7/25; block prep time.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
6/23/25	0.4	Draft document (other)	Set up court appearance form for the scheduled phone conference on the settlement agreement for 7/7/25.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal

Date	Hours	Activity category	Description	Rate (\$)	Billable (\$)	User	Role
6/24/25	0.3	Telephone/Video Meeting	Telephone call with and texts from Ellie regarding status of settlement agreement.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
6/24/25	0.2	Calendar & Task Out All Deadlines/ Appearances/ Dates From Scheduling Order/CMO/TMO	Schedule Zoom for attorney and Ellie Shkolir to discuss status of settlement.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
6/26/25	0.2	Read/review incoming email or correspondence	Read emails from attorney to client and to opposing counsel with revised settlement agreement; task to follow up.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
6/26/25	0.4	Edit Document	next crack at SA	\$ 475.00	\$ 190.00	Penn Dodson	Partner
6/26/25	0.3	Compose/Send Email	client no showed for sched zoom so EM'ed him instead	\$ 475.00	\$ 142.50	Penn Dodson	Partner
6/27/25	0.1	Compose/Send Email	Respond to client's email	\$ 475.00	\$ 47.50	Penn Dodson	Partner
7/1/25	1	Draft document (other)	Preparation of letters to each plaintiff on what to expect with a settlement agreement fully signed.	\$ 195.00	\$ 195.00	Lucy Espinal	Paralegal
7/1/25	0.1	Compose/Send Email	Ping OC re SA status	\$ 475.00	\$ 47.50	Penn Dodson	Partner
7/3/25	0.1	Read/review incoming email or correspondence	Read email from attorney to opposing counsel regarding moving forward with settlement before next week's conference.	\$ 195.00	\$ 19.50	Lucy Espinal	Paralegal
7/3/25	0.3	Process Documents	Process in Settlement Agreement from opposing counsel; accept changes and finalize for signature.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
7/3/25	0.4	Obtain/Secure Signature (RA/SA/Decl/Aff)	Send Settlement Agreement to all Plaintiffs for review and signature by Docusign.	\$ 195.00	\$ 78.00	Lucy Espinal	Paralegal
7/3/25	0.3	Send/Receive Texts	Text messages to/from clients regarding email from Penn and Settlement Agreement sent by Docusign for their review and signature.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
7/3/25	0.8	Compose/Send Email	Review OC's SA edits + decide re how to advise clients, EM them, respond to client ?s	\$ 475.00	\$ 380.00	Penn Dodson	Partner
7/3/25	0.7	Analysis/ Substantive Review	Review OC's SA edits + decide re how to advise clients, respond to client ?s	\$ 475.00	\$ 332.50	Penn Dodson	Partner
7/7/25	0.3	Process Documents	Process in Settlement Agreement signed by Plaintiffs; Slack to attorney.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
7/7/25	0.1	Send/Receive Texts	Text message from Rashad Williams regarding Settlement Agreement.	\$ 195.00	\$ 19.50	Lucy Espinal	Paralegal
7/7/25	0.1	Telephone/Video Meeting	Telephone call with Rashad Williams regarding signing and status of Settlement Agreement.	\$ 195.00	\$ 19.50	Lucy Espinal	Paralegal
7/7/25	0.3	Process Electronic Court Documents	Process in Order regarding result of today's phone conference and Motion to Approve Settlement Agreement due 7/14.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
7/7/25	0.2	Calendar & Task Out All Deadlines/ Appearances/ Dates From Scheduling Order/CMO/TMO	Calendar and task out Order on Motion to Approve Settlement Agreement due 7/14.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
7/7/25	0.2	Read/review incoming email or correspondence	Read email from attorney to opposing counsel with revised settlement agreement; task to follow up.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
7/7/25	0.4	Attend Court	Phone court re SA	\$ 475.00	\$ 190.00	Penn Dodson	Partner
7/10/25	0.2	Compose/Send Email	Follow up email to opposing counsel on Settlement Agreement.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
7/10/25	0.3	Process Documents	Process in opposing counsel's revised settlement agreement; Slack to attorney.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
7/10/25	0.5	Obtain/Secure Signature (RA/SA/Decl/Aff)	Send revised settlement agreement to plaintiffs for signature; accept OC's changes to agreement; text messages to/from clients letting them know to check their email for Docusign to sign settlement agreement.	\$ 195.00	\$ 97.50	Lucy Espinal	Paralegal
7/10/25	0.3	Process Documents	Process in settlement agreement signed by Plaintiffs; internal communication re same.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
7/10/25	0.3	Compose/Send Email	Email to opposing counsel with copy of the settlement agreement signed by Plaintiffs.	\$ 195.00	\$ 58.50	Lucy Espinal	Paralegal
7/11/25	0.2	Compose/Send Email	Follow up email to opposing counsel on his client signing the settlement agreement.	\$ 195.00	\$ 39.00	Lucy Espinal	Paralegal
	315.8		TOTALS		\$ 77,111.00		